	Page 2	Page 4
1	25	
2	DEL VEGGUIO DEDODTINO	2 2
3	DEL VECCHIO REPORTING	3 3
4	(203) 245-9583	4 4
5	2 1 ADDEADANCES.	5 5
6	1 APPEARANCES: 2 FOR THE UNITED STATES OF AMERICA:	6 6
8	2 FOR THE UNITED STATES OF AWIERICA. 3	7 7
9	3 SPECIAL MASTER ROBERT BUNDY, ESQ.	8 8 9 9
10	4 DORSEY & WHITNEY, LLP	
11	4 1031 West Fourth Avenue	10 10
12	5 Anchorage, Alaska 99501-5907	11 11 12 12
13	6	12 12 13 13
14	7 DAVID O'CONNELL, ESQ.	14 14
15	7 U.S. DEPARTMENT OF JUSTICE	
16	8 ENVIRONMENTAL & NATURAL RESOURCES DIVISION	15 15 16 16
17	8 P.O. BOX 23985	17 17
18	9 L'Enfant Plaza Station	18 18
19	9 Washington, D.C. 20026-3985	19 19
20	10	20 20
21	11 JAMES H. SANBORN	21 21
22	11 SANBORN, YEARWOOD & ASSOCIATES	22 22
23	12 324 Keller Road	23 23
24	12 Berwyn, Pennsylvania 19312-1452	24 24
25	13	25 25
		20 20
1	Page 3	Page 5
2	14 CAPTAIN RICHARD C. WIGGER, USCG (RET.)	2 DEL VECCHIO REPORTING
3	14 COMPLIANCE SYSTEMS, INC.	3 (203) 245-9583
4	15 Hamilton House	4
5	15 26 East Bryan Street	5 1 STIPULATIONS
6	16 Savannah, Georgia 31401	6 2 It is hereby stipulated and agreed by and
7	16	7 3 between counsel for the respective parties that all
8	17 CHANNING D. BURGESS, LCDR	8 4 formalities in connection with taking of this
9	17 UNITED STATES COAST GUARD	9 5 deposition, including time, place, sufficiency of
10	18 2100 2nd Street, SW STOP 7581	10 6 and the authority of the officer before whom it is
11	18 Washington, D.C. 20593-7581	11 7 being taken may be and are hereby waived.
12	19	12 8 It is further stipulated and agreed that
13	20 MICHAEL ANTONELLIS, COMMANDER	13 9 objections other than as to form are reserved to
14	20 UNITED STATES COAST GUARD	14 10 the time of trial.
15	21 FIRST DISTRICT LEGAL OFFICE	15 11 It is further stipulated and agreed that a
16	22 FOR IONIA MANAGEMENT, S.A.:	16 12 Notary Public may notarize said deposition.
17	23 MICHAEL G. CHALOS, ESQ.	17 13 It is further stipulated and agreed that the
18	23 GEORGE K. KONTAKIS, ESQ.	18 14 deposition is to be filed with the Superior Court at
19	24 CHALOS, O'CONNOR & DUFFY	19 15 , Connecticut upon request.
20	24 366 Main Street	20 16
21	25 Port Washington, New York 11050	21 17 * * * * *
22	DEL VECCHIO DEDOCTINO	22 18
23	DEL VECCHIO REPORTING	23 19
24 25	(203) 245-9583	24 20 25 21
25	3	ZJ Z

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		Page 6			Page 8
1	22		1	14	Wigger, we'll interrupt. And I think that
2	23		2	15	sounds chaotic, but I think it's worked okay in
3	24		3	16	the past, so that's what we'll do.
4	25		4	17	So, if the Court Reporter would please
5			5	18	swear both Miss Tsochlas and Mr. Karagiorgis,
6	DEL	VECCHIO REPORTING	6	19	and I'm sorry for the way I pronounce your
7	(2	203) 245-9583	7	20	name.
8		5	8	21	
9	1	SPECIAL MASTER BUNDY: This is the final	9	22	
10	2	Special Master's hearing, at least it's the	10	23	
11	3	sixth one, and it's October 19th, 2011, we're	11	24	
12	4	at the courthouse in New Haven, Connecticut.	12	25	
13	5	My name is Robert Bundy, the Special Master.	13		
14	6	James Sanborn, the independent corporate	14	DE	L VECCHIO REPORTING
15	7	consultant, and Captain Richard Wigger, the	15		(203) 245-9583
16	8	independent environmental consultant are	16		7
17	9	present, and if everybody could go around the	17	1	KRYSTYNA TSOCHLAS, of 12 Laskou Street, Piraeus,
18	10	table and everybody can identify themselves,	18	2	Greece, was called as a witness and duly sworn by
19	11	and, lastly, we'll finish up with the witness,	19	3	the Court Reporter, was examined and testified as
20	12	Miss Tsochlas.	20	4	follows:
21	13	MR. CHALOS: Mike Chalos on behalf of	21	5	Tollows.
22			22		CEODOE VADACIODOIS of A Dorosou Street Nikon
23	14 15	Ionia. I'm here with George Kontakis sitting	23	6	GEORGE KARAGIORGIS, of 4 Parssou Street, Nikea,
		to my right, and Mr. George Karagiorgis on		7	Piraeus, was called as a witness and duly sworn by
24	16	behalf of Ionia. And, of course, the witness,	24	8	the Court Reporter, was examined and testified as
25	17	Miss Tsochlas.	25	9	follows:
		Page 7			Dage 0
1	18	Page 7 MR. BURGESS: Channing Burgess, U.S. Coast	1	10	Page 9
2	19	Guard, designated representative from the Coast	2	11	SPECIAL MASTER BUNDY: We'll start off,
3	20	Guard.	3	12	·
4	21	MR. ANTONELLIS: Mike Antonellis, First	4	13	PowerPoint that you've put together and we'll
5	22	District Legal Office, U.S. Coast Guard.	5	14	start going through it.
6	23	MR. O'CONNELL: David O'Connell with the	6	15	MS. TSOCHLAS: Okay. So, we've prepared a
7		Environmental Crime Section, Department of	7	16	PowerPoint based on the agenda.
	24 25	·	8	17	Ğ
8	23	Justice.			SPECIAL MASTER BUNDY: Could you talk
9	DEL	VECCULO DEDODITINO	9	18 19	closely into the microscope? MS. TSOCHLAS: Is that better?
10		VECCHIO REPORTING	10	20	
11	(2	(03) 245-9583	11		SPECIAL MASTER BUNDY: Yes.
12	1	6 SDECIAL MASTED BLINDY: I think wo'll	12	21	MR. CHALOS: And keep your voice up.
13	1	SPECIAL MASTER BUNDY: I think we'll	13	22	THE WITNESS: Okay. I'll try.
14	2	proceed like we usually do, we'll swear in Miss	14	23	SPECIAL MASTER BUNDY: Before you start
15	3	Tsochlas and Mr. Karagiorgis, and then we'll	15	24	ÿ .
16	4	proceed, and I understand, as usual, you've	16	25	consider as we go through this and that as to
17	5	prepared a PowerPoint that you've provided to	17	DE	L VECCULO DEDODTINO
18	6	everybody, and we've all had a chance to look	18		L VECCHIO REPORTING
19	7	at it, and so, what I would ask is after you're	19		(203) 245-9583
20	8	sworn, we can begin and you could take us	20	_	8
21	9	briefly through this, and let's do it like we	21	1	each one of the topics that you've addressed,
22	10	did before, where we'll go slowly, or briefly,	22	2	one of the things that we're interested in is
.).)	11	through it, I should say, and if people have	23	3	what difference is in the company from 2008
23	4.0				contract the country contract the contract that the contract the contract that the contract the contract that the contra
24 25	12 13	questions, be it the Coast Guard or your own counsel or myself or Mr. Sanborn or Captain	24 25	4 5	when this all when the probation started until today.

		Page 10			Page 12
1	6	MS. TSOCHLAS: Okay.	1	DEL	L VECCHIO REPORTING
2	7	SPECIAL MASTER BUNDY: And as you go	2		(203) 245-9583
3	8	through those, please emphasize that.	3		10
4	9	MS. TSOCHLAS: So, shall we start?	4	1	scope of work.
5	10	SPECIAL MASTER BUNDY: Yes.	5	2	So, shall we move onto the first item,
6	11	MS. TSOCHLAS: So, the PowerPoint was	6	3	which is how we've developed procedures for our
7	12	prepared based on the agenda that was issued by	7	4	crew members to maintain written records of
8	13	you this year.	8	5	Waste Management processing in the engine room.
9	14	The first item is how we have developed	9	6	So, we have a developed a number of
10	15	effective procedures for our crew members to	10	7	procedures that we have incorporated in our
11	16	maintain accurate and verifiable written	11	8	environmental management plan regarding Waste
12	17	records regarding Waste Management in the	12	9	Management within the engine room.
13	18	engine room, and this will also include the	13	10	Now, the procedures, I haven't put them in
14	19	findings from our internal audit system, and	14	11	order of significance, I've put them in order
15	20	the findings from the IEC, independent	15	12	as I've found them in our environmental
16	21	environmental consultant's shipboard audits.	16	13	management plan.
17	22	The second item is how we maintain	17	14	SPECIAL MASTER BUNDY: Could I stop you
18	23	shipboard records in accordance with paragraph	18	15	and just ask you a question about the
19	24	4A of the scope of work. Here, again, we also	19	16	environmental management plan?
20	25	have a look at the nonconformities issued	20	17	MS. TSOCHLAS: Of course.
21			21	18	SPECIAL MASTER BUNDY: When did you
22	DEL	VECCHIO REPORTING	22	19	institute or start working on the environmental
23	(2	203) 245-9583	23	20	management plan?
24		9	24	21	MS. TSOCHLAS: We originally had an
25	1	during internal audit, and the findings made by	25	22	environmental management plan that was
		Page 11			Page 13
1	2	Page 11 the IEC during the shipboard audit.	1	23	Page 13 incorporated into our safety management system
1 2	2 3	=	1 2	23 24	incorporated into our safety management system and was based on the requirements of item
		the IEC during the shipboard audit.			incorporated into our safety management system
2	3	the IEC during the shipboard audit. The third item is how we've installed the	2	24	incorporated into our safety management system and was based on the requirements of item
2	3 4	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a	2	24 25	incorporated into our safety management system and was based on the requirements of item
2 3 4	3 4 5	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work.	2 3 4	24 25 DEI	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was
2 3 4 5	3 4 5	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records	2 3 4 5	24 25 DEI	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583
2 3 4 5 6 7 8	3 4 5 6 7 8 9	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in	2 3 4 5 6	24 25 DEI	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO
2 3 4 5 6 7 8 9	3 4 5 6 7 8	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work.	2 3 4 5 6 7 8	24 25 DEI (1 2	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all
2 3 4 5 6 7 8 9	3 4 5 6 7 8 9 10 11	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and	2 3 4 5 6 7 8 9	24 25 DEI (1 2 3	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of
2 3 4 5 6 7 8 9 10	3 4 5 6 7 8 9 10 11 12	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure	2 3 4 5 6 7 8 9 10	24 25 DEI (1 2 3 4	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the
2 3 4 5 6 7 8 9 10 11	3 4 5 6 7 8 9 10 11 12 13	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance	2 3 4 5 6 7 8 9 10 11 12	24 25 DEL (1 2 3 4 5	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management
2 3 4 5 6 7 8 9 10 11 12 13	3 4 5 6 7 8 9 10 11 12 13 14	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This	2 3 4 5 6 7 8 9 10 11 12 13	24 25 DEI 1 2 3 4 5 6	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation
2 3 4 5 6 7 8 9 10 11 12 13 14	3 4 5 6 7 8 9 10 11 12 13 14 15	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the	2 3 4 5 6 7 8 9 10 11 12 13	24 25 DEI 1 2 3 4 5 6 7	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety
2 3 4 5 6 7 8 9 10 11 12 13 14 15	3 4 5 6 7 8 9 10 11 12 13 14 15 16	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible	2 3 4 5 6 7 8 9 10 11 12 13 14 15	24 25 DEI (1 2 3 4 5 6 7 8	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	24 25 DEL 1 2 3 4 5 6 7 8 9	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	24 25 DEI (1 2 3 4 5 6 7 8 9 10	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our environmental management plan, our training	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	24 25 DEL (1 2 3 4 5 6 7 8 9 10 11	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009. SPECIAL MASTER BUNDY: Thank you.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our environmental management plan, our training program, and how we have brought about successful and positive changes in our culture	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	24 25 DEL 1 2 3 4 5 6 7 8 9 10 11 12 13	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009. SPECIAL MASTER BUNDY: Thank you. MS. TSOCHLAS: So, the first procedure that we will discuss is the extraordinary
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our environmental management plan, our training program, and how we have brought about successful and positive changes in our culture in the company.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	24 25 DEI (1 2 3 4 5 6 7 8 9 10 11 12 13 14	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009. SPECIAL MASTER BUNDY: Thank you. MS. TSOCHLAS: So, the first procedure that we will discuss is the extraordinary engine room operations monitoring. This is a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our environmental management plan, our training program, and how we have brought about successful and positive changes in our culture in the company. And the sixth item is how we have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	24 25 DEL 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009. SPECIAL MASTER BUNDY: Thank you. MS. TSOCHLAS: So, the first procedure that we will discuss is the extraordinary engine room operations monitoring. This is a procedure that requires that any extraordinary
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	the IEC during the shipboard audit. The third item is how we've installed the SWOMS on board our vessels in accordance with paragraph 4B of the scope of work. The fourth item is how we've developed a procedure in order to analyze and compare our shipboard records with the electronic records produced by the SWOMS and how we are in compliance with the scope of work. The fifth item is the system and procedures we've developed in order to ensure we have a culture of environmental compliance on board our vessels and in our company. This will include our management structure, the independence of the people who are responsible for ensuring environmental compliance, the development and implementation of our environmental management plan, our training program, and how we have brought about successful and positive changes in our culture in the company. And the sixth item is how we have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	24 25 DEL 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	incorporated into our safety management system and was based on the requirements of item 14,001 and then following the order that was L VECCHIO REPORTING (203) 245-9583 11 carried out by Captain Wigger onboard the THEO T, the initial order. It was the first of all of our shipboard audits. A number of recommendations were made as to the requirements of our environmental management plan and our procedures, and the recommendation we should separate it from the safety management systems, so that is when we started working on developing the plan and it finally came into full effect on the 1st of July 2009. SPECIAL MASTER BUNDY: Thank you. MS. TSOCHLAS: So, the first procedure that we will discuss is the extraordinary engine room operations monitoring. This is a procedure that requires that any extraordinary

	10	Page 14			Page 16
1	19	the waste has been handled.	1	11	MR. ANTONELLIS: I'm Michael Antonellis
2	20	SPECIAL MASTER BUNDY: Was this added	2	12	and I'm with the Coast Guard.
3	21	was this in your previous	3	13	Is this logbook separate and distinct to
4	22	THE WITNESS: No, this is a new procedure	4	14	the oil record book?
5	23	that was implemented and it was it comes out	5	15	MS. TSOCHLAS: It's an independent
6	24	of the scope of work, and Captain Wigger's	6	16	logbook.
7	25	recommendations.	7	17	MR. ANTONELLIS: Will they also be logging
8			8	18	in the oil record book the same?
9		VECCHIO REPORTING	9	19	MS. TSOCHLAS: Yes, these would correlate.
10	(2	03) 245-9583	10	20	MR. ANTONELLIS: Thank you.
11		12	11	21	MS. TSOCHLAS: Then we'll go to the next
12	1	Now, extraordinary engine room operations	12	22	slide.
13	2	are any kind of operation that will increase	13	23	The next procedure is similar to the
14	3	the waste generation or production within the	14	24	extraordinary operations, it's the unintended
15	4	engine room. For example, if we receive poor	15	25	or accidental release of water fuel oil and
16	5	quality bunker fuel that we won't be able to	16		
17	6	use, we have to justify how we'll handle that	17	DEL	. VECCHIO REPORTING
18	7	bunker fuel.	18	((203) 245-9583
19	8	So, if we click on the attachment, I've	19		14
20	9	highlighted from the plan the guidelines on how	20	1	lube oil from engine room machinery and
21	10	this procedure is to be implemented.	21	2	leakages. So, if we have any kind of major
22	11	We have a logbook onboard the vessel for	22	3	leak in the engine room that generates a larger
23	12	any kind of extraordinary or engine room	23	4	quantity of unwanted fluid, that must be logged
24	13	operation, the chief engineer has to log that	24	5	in the logbook. The reason for it's release
25	14	operation and justify explain how much waste	25	6	must be explained and how it's handled must
-					
		Page 15			Page 17
1	15	was produced and justify how that was handled.	1	7	also be justified.
2	16	Shall we go to the next slide?	2	8	And we can open the link.
3	17	MR. O'CONNELL: Can I ask a question?	3	9	So, that's the procedure that's
4	18	SPECIAL MASTER BUNDY: Yes.	4	10	highlighted, and below we have the leakages,
5	19	MS. TSOCHLAS: Of course.	5	11	which I've put a separate link on.
6	20	SPECIAL MASTER BUNDY: Make sure you	6	12	MR. O'CONNELL: I have another question.
7	21	identify yourself.	7		•
8	าา		l -	13	SPECIAL MASTER BUNDY: Okay.
	22	MR. O'CONNELL: Dave O'Connell from the	8	14	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same
9	23	Department of Justice.	8	14 15	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was
10	23 24	Department of Justice. Have there been a review of those logs and	8 9 10	14 15 16	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any
10 11	23	Department of Justice.	8 9 10 11	14 15 16 17	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually
10 11 12	23 24 25	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications	8 9 10 11 12	14 15 16 17 18	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar
10 11 12 13	23 24 25 DEL	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING	8 9 10 11 12 13	14 15 16 17 18 19	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we
10 11 12 13 14	23 24 25 DEL	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING (203) 245-9583	8 9 10 11 12 13 14	14 15 16 17 18 19 20	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we have one logbook for all of these cases.
10 11 12 13 14 15	23 24 25 DEL	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING (203) 245-9583	8 9 10 11 12 13 14 15	14 15 16 17 18 19 20 21	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we have one logbook for all of these cases. MR. O'CONNELL: And there's been no
10 11 12 13 14	23 24 25 DEL	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING 13 in the log?	8 9 10 11 12 13 14 15 16	14 15 16 17 18 19 20 21 22	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we have one logbook for all of these cases. MR. O'CONNELL: And there's been no MS. TSOCHLAS: We've had no excessive
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10 11 12 13 14 15 16 17 18	23 24 25 DEL (2	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING 103) 245-9583 13 in the log? MS. TSOCHLAS: We haven't had any since the implementation, we haven't had any extraordinary engine room breakage because all	8 9 10 11 12 13 14 15 16 17 18	14 15 16 17 18 19 20 21 22 23	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we have one logbook for all of these cases. MR. O'CONNELL: And there's been no MS. TSOCHLAS: We've had no excessive leaks. Because, as I have said, the vessels
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10 11 12 13 14 15 16 17 18 19 20 21 22 23	23 24 25 DEL (2 1 2 3 4 5 6 7 8	Department of Justice. Have there been a review of those logs and have there been any extraordinary notifications VECCHIO REPORTING 103) 245-9583 13 in the log? MS. TSOCHLAS: We haven't had any since the implementation, we haven't had any extraordinary engine room breakage because all our vessels are new. These kinds of things usually occur with older vessels that are having problems in the engine room, and we haven't received any poor bunker fuel as of yet	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	14 15 16 17 18 19 20 21 22 23 24 25 DEL	SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: I would ask the same question, have those been reviewed and was there any MS. TSOCHLAS: Yes. This is actually it's one logbook because it's a very similar process, we have a very similar format, so we have one logbook for all of these cases. MR. O'CONNELL: And there's been no MS. TSOCHLAS: We've had no excessive leaks. Because, as I have said, the vessels are new, these problems will come up later on in the vessel's life. VECCHIO REPORTING (203) 245-9583

		Page 18			Page 20
1	3	one of those logbooks that we would check, and	1	24	MS. TSOCHLAS: Yes.
2	4	if there were any extraordinary operations or	2	25	The next procedure is the fuel and lube
3	5	significant leakages, we'd follow-up in	3		·
4	6	question or, you know, see how they're handled,	4	DEL	VECCHIO REPORTING
5	7	SO.	5	(203) 245-9583
6	8	MS. TSOCHLAS: The next procedure now,	6		17
7	9	we'll move away from extraordinary generation	7	1	oil management and bilge and sludge production
8	10	of waste in the engine room. This is to do	8	2	monitoring report. The chief engineer is
9	11	with oil to sea interface management. Any	9	3	required to report on a weekly basis the
10	12	systems on the vessel that have oil to sea	10	4	quantity, amongst other things, the quantity of
11	13	interface are monitored on a daily basis in	11	5	bilge and sludge retained onboard, the number
12	14	order to ensure that there's no loss of	12	6	of hours that the incinerator has been
13	15	operating medium into the surrounding waters or	13	7	operated, and the number of hours that the oily
14	16	ingress of waters into those tanks.	14	8	water separator has been operated.
15	17	On our vessels we have the only such	15	9	Now, if we open the attachment, we have
16	18	system that we have is the stern tube. So, we	16	10	the procedure. This is submitted to the
17	19	have the procedure where the chief engineer is	17	11	technical department on a weekly basis and
18	20	required to sound these tanks on a daily basis	18	12	reviewed by the responsible superintendent of
19	21	and enter the results of the sounding into the	19	13	engineers.
20	22	engine logbook.	20	14	If we move onto the next page, this is an
21	23	Shall we move on to the next item?	21	15	example of the report and you'll see there is a
22	24	The next item is the tank sounding log.	22	16	lot of information, a lot of data in this
23	25	We are required to carry out our vessels are	23	17	report; the consumption of fuel lube oil, the
24			24	18	production of fresh water and bilges and
25	DEL	VECCHIO REPORTING	25	19	sludges, it also has information that the
		Page 19			Page 21
1	(2	203) 245-9583	1	20	superintendent of engineers can review in order
2	(2	203) 245-9583 16	2	21	superintendent of engineers can review in order to monitor that the generation of waste in the
2	1	203) 245-9583 16 required to carry out daily soundings, included	2	21 22	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled.
2 3 4	1 2	203) 245-9583 16 required to carry out daily soundings, included in form B of the IOPP certificate in the engine	2 3 4	21 22 23	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the
2	1	203) 245-9583 16 required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the	2	21 22 23 24	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically?
2 3 4 5 6	1 2 3 4	203) 245-9583 16 required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work.	2 3 4 5 6	21 22 23	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the
2 3 4 5 6 7	1 2 3 4 5	203) 245-9583 16 required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure.	2 3 4 5 6 7	21 22 23 24 25	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a
2 3 4 5 6 7 8	1 2 3 4 5 6	203) 245-9583 16 required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of	2 3 4 5 6 7 8	21 22 23 24 25 DEL	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a
2 3 4 5 6 7 8 9	1 2 3 4 5 6 7	required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of the sounding log, an example of the sounding	2 3 4 5 6 7 8 9	21 22 23 24 25 DEL	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a VECCHIO REPORTING 203) 245-9583
2 3 4 5 6 7 8 9	1 2 3 4 5 6 7 8	required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of the sounding log, an example of the sounding log.	2 3 4 5 6 7 8 9	21 22 23 24 25 DEL	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a VECCHIO REPORTING 203) 245-9583
2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8	required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of the sounding log, an example of the sounding log. What I'd like to stress with the	2 3 4 5 6 7 8 9 10 11	21 22 23 24 25 DEL (2	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a VECCHIO REPORTING 203) 245-9583 18 weekly basis.
2 3 4 5 6 7 8 9 10 11 12	1 2 3 4 5 6 7 8 9	required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of the sounding log, an example of the sounding log. What I'd like to stress with the implementation of the environmental management	2 3 4 5 6 7 8 9 10 11 12	21 22 23 24 25 DEL (2	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a VECCHIO REPORTING 203) 245-9583 18 weekly basis. So, if we move to the next slide, this is
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	required to carry out daily soundings, included in form B of the IOPP certificate in the engine room. This is in accordance with the requirements of the scope of work. And here we have the procedure. And on the next page, we have a copy of the sounding log, an example of the sounding log. What I'd like to stress with the implementation of the environmental management plan, including all these procedures in that plan, is that we would like to demonstrate our commitment to ensuring our procedures are properly implemented onboard our vessels and to enhance the culture of the environmental compliance onboard our vessels. So, this is the important thing for us that we've included in our environmental management log. SPECIAL MASTER BUNDY: Which one of these procedures, if any, were new?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12	superintendent of engineers can review in order to monitor that the generation of waste in the vessel is normal and properly handled. SPECIAL MASTER BUNDY: Is this sent to the headquarters electronically? MS. TSOCHLAS: Electronically, yes, on a VECCHIO REPORTING 203) 245-9583 18 weekly basis. So, if we move to the next slide, this is our waste stream management process; this is guidance provided to our shipboard personnel on how the handling of waste onboard the vessel should be carried out. This includes all kinds of waste, it's not limited to waste generated in the engine room. It's a flowchart diagram, which shows gray water, black water, bilge water, sludges, catering waste, and special waste. We had a similar procedure in place due to

		Page 22			Page 24
1	16	initial audit.	1	8	resolution, has that been
2	17	Now, the next procedure is regarding	2	9	MS. TSOCHLAS: That is why it's the 30th
3	18	maintenance of the oil record books part one	3	10	through September.
4	19	and two.	4	11	MR. WIGGER: And that came out on
5	20	We have provided these are guidelines	5	12	August 30th, and that's incorporated as well?
6	21	that provide details to our shipboard personnel	6	13	MS. TSOCHLAS: It is.
7	22	on the items that we want to be recorded in the	7	14	MR. O'CONNELL: Dave O'Connell.
8	23	oil record book part one and two over and above	8	15	What IMO solution are you referring to?
9	24	MARPOL requirements because all our chief	9	16	MR. WIGGER: Additional guidance it's
10	25	engineers are familiar with MARPOL	10	17	actually a revision of the previous resolution,
11		ongmoore are rammar than an el	11	18	I think it's 798, something around the 700
12	DEL	. VECCHIO REPORTING	12	19	series, but it had to do with oil record book
13		203) 245-9583	13	20	entries and guidance on record book entries,
14	`	19	14	21	and they've updated that guidance and made
15	1	requirements, but we have a number of	15	22	revisions to the IMO circular.
16	2	additional things that we would like recorded	16	23	MR. O'CONNELL: Thank you.
17	3	in the oil record book based on the scope of	17	24	MS. TSOCHLAS: Generally, we find it very
18	4	work and based on voluntary reporting	18	25	important to monitor everything that's changing
19	5	requirements, which we provide guidelines on.	19		important to monitor everything mate enanging
20	6	And here are the guidelines. You can see	20	DEL	VECCHIO REPORTING
21	7	that they are quite extensive.	21		203) 245-9583
22	8	SPECIAL MASTER BUNDY: And this guidance	22	`	21
23	9	that you provide the crew, is this something	23	1	in legislation and requirements in the shipping
24	10	that was put into place since 2008?	24	2	industry, which is practically on a daily
25	11	THE WITNESS: Yes.	25	3	basis, very closely, and making the amendments
					3
		Page 23			Page 25
1	12	Anything that's not new, I'll mention what	1	4	as soon as possible, as soon as the
2	13	was in place before.	2	5	requirements come out, and we try to implement
3	14	SPECIAL MASTER BUNDY: Okay.	3	6	the requirements often before they've actually
4	15	MS. TSOCHLAS: If I don't mention it, it	4	7	come into effect. For example, the ship to
5	16	means it's new.	5	8	ship transfer plan that came into effect at the
6	17	MR. CHALOS: This is Michael Chalos.	6	9	beginning of this year, we had implemented it
7	18	Miss Tsochlas, have your procedures	7	10	within the last year. We try as much, to the
8	19	incorporated recent changes, IMO changes	8	11	best of our ability, to keep ahead of the
9	20	MS. TSOCHLAS: The ones that came into	9	12	regulations.
10	21	effect in January of this year?	10	13	Shall we move to the next slide?
11	22	MR. KARAGIORGIS: Yes.	11	14	Now, we provide additional lines that we
12	23	MS. TSOCHLAS: Yes, they have, but a	12	15	wish to be recorded in the engine logbook,
13	24	number of those items that came into effect	13	16	again, over and above the normal requirements
14	25	this year were voluntary before and we had them	14	17	of the industry.
15	חבי	VECCUIO DEDODTINO	15	18	If we open the attachment, you'll see we
16		. VECCHIO REPORTING	16	19	have some additional items that we wish to be
17	(203) 245-9583	17	20	recorded in the engine logbook.
18	1	20	18	21 22	And the same goes for the garbage logbook.
19	1	already in place.	19		The difference the requirements that we have
20	2	MR. CHALOS: And your manual and	20	23	over and above MARPOL Annex V for the garbage
21	3	procedures?	21	24 25	logbook is that we want special waste to be
22	4	THE WITNESS: If you look at the revision,	22 23	25	recorded separately. Special waste being
23 24	5 6	our procedures are being updated all the time. MR. WIGGER: Continuing with Mr. Chalos's		DEI	VECCHIO REPORTING
25	7	question. Recently there was an IMO	24 25		203) 245-9583
23	,	question. Recently there was all tivio	23	(.	200) 270-7000

					2
1		Page 26 22	1	21	Page 28 The first item is a number of forms that
2	1	things like batteries that we try and recycle,	2	22	we revised over the time of implementation of
3	2	paper, things that go towards our	3	23	the environmental management plan, often the
4	3	environmentally friendly policy.	4	24	shipboard personnel continue to use the
5	4	And then the last item is a vessel	5	25	previous revision the form. We found that in
6	5	environmental report, which has nothing to do	6	20	previous revision the form. We found that in
7	6	with the waste generated in the engine room,	7	DFI	VECCHIO REPORTING
8	7	it's to do with the overall waste that's	8		203) 245-9583
9	8	generated by the vessel. We request the vessel	9	(-	24
10	9	report to us on a monthly basis the batteries	10	1	certain cases the EGP procedures were not being
11	10	that are discarded and go for recycling	11	2	properly implemented. Alarm printouts were not
12	11	purposes, paper, fluorescent bulbs and such, so	12	3	being properly dated by the chief engineer.
13	12	that we have a KPI, a key performance	13	4	Often in an engine log, the designation of the
14	13	indicator, in order to monitor our	14	5	officer responsible for operating the oily
15	14	environmental performance.	15	6	water separator and the incinerator had not
16	15	Okay. So, are there any questions on that	16	7	been entered in the engine logbook, either it
17	16	section?	17	8	hadn't been entered or it hadn't been entered
18	17	SPECIAL MASTER BUNDY: When your vessels	18	9	exactly as we had requested in our guidelines.
19	18	have come in, are there any port stay	19	10	Discrepancies in the oil record book part
20	19	efficiencies noted in your recordkeeping?	20	11	one.
21	20	MS. TSOCHLAS: In our recordkeeping? No.	21	12	No documented evidence that the oil to sea
22	21	SPECIAL MASTER BUNDY: The waste stream	22	13	interface systems were being monitored.
23	22	and things that you just covered?	23	14	No evidence available to verify the
24	23	MS. TSOCHLAS: Generally not with the	24	15	recommendations recorded during previous audits
25	24	environmental, no.	25	16	carried out by the IEC had been implemented.
		Page 27			Page 29
1	25	So, now if we move onto the next slide,	1	17	What we meant by that was that the response
2			2	18	that we prepared and sent to Captain Wigger
3	DEL	VECCHIO REPORTING	3	19	following an audit in response to his
4	(2	203) 245-9583	4	20	recommendations had not been provided to the
5		23	5	21	vessel. We followed up, but the actions had
6	1	here we have a summary of the internal audit	6	22	been taken, but we hadn't provided the final
7	2	findings regarding recordkeeping.	7	23	report to the vessels.
8	3	Now, with the implementation of the	8	24	
9	4			27	Inadequate recordkeeping regarding the
10	•	environmental management plan in 2009, we began	9	25	Inadequate recordkeeping regarding the storage of flexible hoses.
10	5	environmental management plan in 2009, we began the implementation of our environmental	9 10		
11		the implementation of our environmental internal audit process, so we began carrying	10 11	25 DEL	storage of flexible hoses. VECCHIO REPORTING
11 12	5	the implementation of our environmental internal audit process, so we began carrying out independent environmental audits on board	10 11 12	25 DEL	storage of flexible hoses. VECCHIO REPORTING 203) 245-9583
11 12 13	5 6 7 8	the implementation of our environmental internal audit process, so we began carrying out independent environmental audits on board our vessels, in other words, not integrated	10 11	25 DEL	storage of flexible hoses. VECCHIO REPORTING 203) 245-9583 25
11 12	5 6 7	the implementation of our environmental internal audit process, so we began carrying out independent environmental audits on board our vessels, in other words, not integrated with the ISM and the ISPS internal audit. The	10 11 12 13 14	25 DEL (2	storage of flexible hoses. VECCHIO REPORTING 203) 245-9583 25 The copies of the scope of work were not
11 12 13 14 15	5 6 7 8	the implementation of our environmental internal audit process, so we began carrying out independent environmental audits on board our vessels, in other words, not integrated with the ISM and the ISPS internal audit. The internal audits are focused entirely on the	10 11 12 13	25 DEL (2 1 2	storage of flexible hoses. VECCHIO REPORTING 203) 245-9583 25 The copies of the scope of work were not placed in the locations as required by our
11 12 13 14 15 16	5 6 7 8 9 10 11	the implementation of our environmental internal audit process, so we began carrying out independent environmental audits on board our vessels, in other words, not integrated with the ISM and the ISPS internal audit. The	10 11 12 13 14 15 16	25 DEL (2 1 2 3	storage of flexible hoses. VECCHIO REPORTING 203) 245-9583 25 The copies of the scope of work were not placed in the locations as required by our environmental management plan.
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		Page 30		_	Page 32
1	13	the oily water separate is being maintained in	1	5	All of the discrepancies found have been
2	14	accordance with the maker's instructions.	2	6	addressed.
3	15	There was inadequate recordkeeping regarding	3	7	If we open up the spreadsheet, you'll see
4	16	the environmental system.	4	8	we have the vessel, the date of the audit, the
5	17	Discrepancies in form B of the IOPP	5	9	observation. Each observation is analyzed in
6	18	certificate.	6	10	order to identify its root cause. We do that
7	19	No evidence available to demonstrate that	7	11	so we can ensure that we'll solve the problem
8	20	the pre-joining training and familiarization	8	12	causing the observation at its root and ensure
9	21	concerning the environmental management plan	9	13	that it won't occur again, we implement
10	22	had been carried out.	10	14	corrective actions to fix the problem, and we
11	23	All of these discrepancies have to do with	11	15	implement preventive actions in order to ensure
12	24	recordkeeping. They were being carried out,	12	16	that it won't recur in the future.
13	25	but the recordkeeping was not exactly the way	13	17	I'm not going to go through the
14		· C	14	18	spreadsheet.
15	DEL V	/ECCHIO REPORTING	15	19	SPECIAL MASTER BUNDY: Oh, no, please
16		03) 245-9583	16	20	don't.
17	ζ	26	17	21	I have one question. It mentions a couple
18	1	we wanted them to be. Inadequate records of	18	22	of times in the vessel's environmental officer,
19	2	the Master's environmental review,	19	23	unless you're going to address that later on in
20	3	discrepancies in the garbage logbook,	20	24	the presentation, could you tell us something
21	4	discrepancies in the oil record book part two,	21	25	about the program that nominates and appoints
22	5	inadequate recordkeeping of shipboard drills of	22	23	about the program that norminates and appoints
23			23	DEI	VECCHIO REPORTING
	6	the Fleet engineering surveys of the tank			
24	7	sounding log and the handbook process.	24	(.	203) 245-9583
25	8	Now, if we open up the summary, you'll see	25		28
		Page 31			Page 33
1	9	Page 31 that all of these	1	1	Page 33 somebody as the environmental officer and what
1 2	9 10	that all of these	1 2	1 2	somebody as the environmental officer and what
2	10	that all of these MR. CHALOS: These internal audits are	2	2	somebody as the environmental officer and what that person's role is and to whom that person
2 3	10 11	that all of these MR. CHALOS: These internal audits are carried out by who?	2	2	somebody as the environmental officer and what that person's role is and to whom that person reports.
2 3 4	10 11 12	that all of these MR. CHALOS: These internal audits are carried out by who? MS. TSOCHLAS: By our superintendents. By	2 3 4	2 3 4	somebody as the environmental officer and what that person's role is and to whom that person reports. MS. TSOCHLAS: The chief officer is
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 DEL V	that all of these MR. CHALOS: These internal audits are carried out by who? MS. TSOCHLAS: By our superintendents. By superintendents, by Mr. Karagiorgis, and by myself. MR. CHALOS: They go onboard the ship and check everything out and compare to your manual and then report as to any discrepancies they find? MS. TSOCHLAS: Exactly. MR. CHALOS: You've just read a list of all the discrepancies on selected vessels all of MS. TSOCHLAS: It's discrepancies on all, not it's not the same discrepancies on each vessel, it's a summary of all the discrepancies ECCHIO REPORTING 03) 245-9583 27 that were found during the internal audits on various vessels.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	somebody as the environmental officer and what that person's role is and to whom that person reports. MS. TSOCHLAS: The chief officer is designated as the environmental officer, he is trained, prior to joining the vessel, in his duties as an environmental officer and he carries out his duties onboard as an environmental officer and reports to the environmental management representative, who is me, and the CCM, Mr. Karagiorgis, through the Master. SPECIAL MASTER BUNDY: Through the Master? MS. TSOCHLAS: Yes, through the Master. He has, if he wishes to report directly, contact details are always available on the vessel and he is in a position to contact either the CCM or me directly. SPECIAL MASTER BUNDY: Okay. Thank you. Mr. O'Connell? MR. O'CONNELL: I do have some questions about this spreadsheet regarding the IEC audits

		Page 34			Page 36
1			1	18	the sewage treatment plan. The format of the
2		VECCHIO REPORTING	2	19	Master's handover report required amendment.
3	(2	203) 245-9583	3	20	Inadequate recordkeeping regarding the storage
4		29	4	21	of flexible hoses. Lack of designation of the
5	1	this stuff?	5	22	officer responsible for operating the oily
6	2	SPECIAL MASTER BUNDY: Why don't we wait.	6	23	water separator and the incinerator in the
7	3	MS. TSOCHLAS: So, shall we move to the	7	24	engine logbook. And the format of the ballast
8	4	next slide?	8	25	tank inspection report required there was a
9	5	SPECIAL MASTER BUNDY: Yes.	9		
10	6	MS. TSOCHLAS: Now, this is a summary of	10		_ VECCHIO REPORTING
11	7	the audit findings made by the IEC during his	11	((203) 245-9583
12	8	shipboard audit. These are the findings that	12		31
13	9	were found onboard the vessels during all of	13	1	recommendation to amend that.
14	10	the audits carried out through the period. So,	14	2	So, here we have the summary on the next
15	11	the initial audits, the ongoing audits, and the	15	3	slide. We have all the recommendations made by
16	12	final audits onboard all four vessels.	16	4	the IEC throughout the period in detail and
17	13	So, the IEC had found inadequate	17	5	we've included as well our response to the IEC
18	14	recordkeeping regarding the implementation of	18	6	addressing those recommendations. What's
19	15	the environmental seals system. Discrepancies	19	7	important with all of this process is that all
20	16	between manual tank soundings and SWOMS	20	8	of the recommendations and all the findings
21	17	records. Inadequate recordkeeping regarding	21	9	that we've made through internal audits have
22	18	declaration of environmental commitment and	22	10	been addressed and should have been revolved,
23	19	compliance. Inadequate recordkeeping regarding	23	11	and we're monitoring very closely the proper
24	20	the environmental procedure for non-crew	24	12	recommendations of our environmental
25	21	members. And based on that recommendation, we	25	13	requirements onboard our vessel.
1	22	Page 35	_	11	Page 37
1	22 23	actually changed a whole procedure. Inadequate	1	14 15	SPECIAL MASTER BUNDY: Mr. O'Connell is
2		recordkeeping of the ballast water exchange	2		
	2/		2		this a time for you to discuss because we've
3	24	procedures, discrepancies in the oil record	3	16	got the spreadsheet here. This is just
4	24 25	book part two. We've revised quite a few times	4	16 17	got the spreadsheet here. This is just recordkeeping issues, that these two
	25	book part two. We've revised quite a few times		16 17 18	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've
4 5 6	25 DEL	book part two. We've revised quite a few times VECCHIO REPORTING	4 5 6	16 17 18 19	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is
4 5 6 7	25 DEL	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583	4 5 6 7	16 17 18 19 20	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it.
4 5 6 7 8	25 DEL (2	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30	4 5 6 7 8	16 17 18 19 20 21	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure
4 5 6 7 8 9	25 DEL (2	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations	4 5 6 7 8	16 17 18 19 20 21 22	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet.
4 5 6 7 8 9	25 DEL (2	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not	4 5 6 7 8 9	16 17 18 19 20 21 22 23	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay.
4 5 6 7 8 9 10 11	25 DEL (2 1 2 3	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP	4 5 6 7 8 9 10 11	16 17 18 19 20 21 22 23 24	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: Could we go back to the
4 5 6 7 8 9 10 11 12	25 DEL (2 1 2 3 4	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP requirements. Discrepancies in the Fleet	4 5 6 7 8 9 10 11 12	16 17 18 19 20 21 22 23	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay.
4 5 6 7 8 9 10 11 12 13	25 DEL (2 1 2 3 4 5	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP requirements. Discrepancies in the Fleet engineering survey. The improper	4 5 6 7 8 9 10 11 12 13	16 17 18 19 20 21 22 23 24 25	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: Could we go back to the previous spreadsheet?
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP requirements. Discrepancies in the Fleet engineering survey. The improper implementation of the anonymous reporting procedure, which was entirely revised based on that recommendation. Discrepancies in the chief engineer's weekly report. Lack of evidence in pre-joining familiarization and training regarding the EMP. The list of minimum spares regarding pollution prevention	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	16 17 18 19 20 21 22 23 24 25 DEI	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: Could we go back to the previous spreadsheet? L VECCHIO REPORTING (203) 245-9583 32 MS. TSOCHLAS: Attachment 12? MR. O'CONNELL: Yes. Thank you. I'll go in order. Number eight. MS. TSOCHLAS: Yup.
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP requirements. Discrepancies in the Fleet engineering survey. The improper implementation of the anonymous reporting procedure, which was entirely revised based on that recommendation. Discrepancies in the chief engineer's weekly report. Lack of evidence in pre-joining familiarization and training regarding the EMP. The list of minimum spares regarding pollution prevention equipment. There was a recommendation to amend that list. Inadequate recordkeeping regarding the Master's environmental review. And the	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	16 17 18 19 20 21 22 23 24 25 DEI (2 3 4 5 6 7	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: Could we go back to the previous spreadsheet? L VECCHIO REPORTING (203) 245-9583 32 MS. TSOCHLAS: Attachment 12? MR. O'CONNELL: Yes. Thank you. I'll go in order. Number eight. MS. TSOCHLAS: Yup. MR. O'CONNELL: The action was the MS. TSOCHLAS: That was, as I mentioned earlier, we had followed up the actual items
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12 13 14	book part two. We've revised quite a few times VECCHIO REPORTING 203) 245-9583 30 the tank sounding log based on recommendations by the IEC. The notice of intent was not available onboard in order with the EGP requirements. Discrepancies in the Fleet engineering survey. The improper implementation of the anonymous reporting procedure, which was entirely revised based on that recommendation. Discrepancies in the chief engineer's weekly report. Lack of evidence in pre-joining familiarization and training regarding the EMP. The list of minimum spares regarding pollution prevention equipment. There was a recommendation to amend that list. Inadequate recordkeeping regarding	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	16 17 18 19 20 21 22 23 24 25 DEI	got the spreadsheet here. This is just recordkeeping issues, that these two spreadsheets were directed to. So, if you've got anything that you want to inquire, this is probably a good time to do it. MR. O'CONNELL: I just want to make sure I'm on the right spreadsheet. SPECIAL MASTER BUNDY: Okay. MR. O'CONNELL: Could we go back to the previous spreadsheet? L VECCHIO REPORTING (203) 245-9583 32 MS. TSOCHLAS: Attachment 12? MR. O'CONNELL: Yes. Thank you. I'll go in order. Number eight. MS. TSOCHLAS: Yup. MR. O'CONNELL: The action was the MS. TSOCHLAS: That was, as I mentioned

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1	10	Page 38	_	2	Page 40
1	10	question is.	1	2	vessels have confirmed that it's been properly
2	11	MR. O'CONNELL: The question is noted at	2	3	implemented onboard, and that was further
3	12	least on the THEO T that there was no follow-up	3	4	confirmed by Captain Wigger when he boarded the
4	13	to what the IEC was doing and that was going to	4	5	PLOUTOS because he didn't find any issues
5	14	be distributed throughout the Fleet. Has Ionia	5	6	there, and that is one of the things that he
6	15	found a repeat of that in any other vessels?	6	7	checks.
7	16	MS. TSOCHLAS: When we say distributed	7	8	MR. CHALOS: Captain Wigger?
8	17	throughout the fleet, it was the prepared	8	9	MR. WIGGER: That's correct.
9	18	response, as I mentioned earlier, that the	9	10	MR. O'CONNELL: Number 13 deals with the
10	19	report of the response that we had sent to	10	11	seal logbook and the action was will be
11	20	Captain Wigger that was missing, so we went out	11	12	distributed through the fleet and relevant
12	21	to all the vessels to make sure that they had,	12	13	confirmation will be requested in order to
13	22	not just for the IEC audits, for any kind of	13	14	identify the relevant missions.
14	23	inspection audit we had on the vessel, to	14	15	What's the status of that? Was there any
15	24	ensure that we've got all the official	15	16	other problems with any other vessels?
16	25	responses that we send out to third parties. A	16	17	MS. TSOCHLAS: Oh, yes, that's been closed
17	55.	UEGOLUG DEDODĪJUG	17	18	out on all of the vessels.
18		VECCHIO REPORTING	18	19	MR. O'CONNELL: Do we know if there was
19	(2)	03) 245-9583	19	20	any other problems with the seal logs?
20		33	20	21	MS. TSOCHLAS: With the seal logs? No,
21	1	couple of vessels we did find that maybe the	21	22	there were no other problems. That was over a
22	2	response was missing to a vetting inspection.	22	23	year ago that observation.
23	3	This process of sending out the official	23	24	MR. WIGGER: The PLOUTOS was the last of
24	4	response is separate to the actual follow-up of	24	25	the final audits and that was the one that I
25	5	closing out of the observations onboard.	25		
		Page 30			Page /1
1	6	Page 39 MR. CHALOS: Are you saying when Captain	1	DEL	Page 41 VECCHIO REPORTING
	6 7	MR. CHALOS: Are you saying when Captain	1 2		VECCHIO REPORTING
2	7	MR. CHALOS: Are you saying when Captain Wigger makes an observation on one ship and you	2		VECCHIO REPORTING 203) 245-9583
		MR. CHALOS: Are you saying when Captain Wigger makes an observation on one ship and you address it, you send it to all the ships?		(2	VECCHIO REPORTING 203) 245-9583 35
2 3 4	7 8 9	MR. CHALOS: Are you saying when Captain Wigger makes an observation on one ship and you address it, you send it to all the ships? MS. TSOCHLAS: Yes. Generally, that is	2 3 4	1	VECCHIO REPORTING 203) 245-9583 35 did myself, but the seal log on that was
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1	23	Page 42	1	15	Page 44
2	23 24	over a year now. MR. O'CONNELL: Number 17 has to deal with	2	16	response from the recipients that, yes, they've done it and this is what we've done and that
3	25	PLOUTOS.	3	17	sort of thing?
4	25	1 200 103.	4	18	MS. TSOCHLAS: Yes, we do. It's a very
5	DFI	VECCHIO REPORTING	5	19	important part of the process ensuring that our
6		203) 245-9583	6	20	non-conformities and recommendations and
7	(-	36	7	21	observations are properly closed out. We place
8	1	MS. TSOCHLAS: Yes.	8	22	due dates on all of the observations, on all of
9	2	MR. O'CONNELL: The cleaning of the bilge	9	23	the actions so that they can be properly
10	3	holding tank. And I believe this had to do	10	24	followed up, and whatever is requested we
11	4	this was actually being implemented or being	11	25	ensure that we get from the vessels the
12	5	done and signed off in the PMS for the vessel	12	20	onsure that we get from the vessels the
13	6	but not in the oil record book?	13	DFI	. VECCHIO REPORTING
14	7	MS. TSOCHLAS: Yes.	14		203) 245-9583
15	8	MR. O'CONNELL: And was there a follow-up	15	`	38
16	9	in the fleet to make sure that these actions	16	1	feedback that we want. And then when
17	10	were being entered in the oil record book?	17	2	superintendent engineers go onboard, anything
18	11	MS. TSOCHLAS: Yes, there was a follow-up,	18	3	that has been advised by the vessel has been
19	12	and it was confirmed by all vessels that they	19	4	closed out, is verified by the superintendent
20	13	were recording properly.	20	5	when he goes onboard.
21	14	MR. O'CONNELL: Number 18, this is an	21	6	MR. SANBORN: Thank you.
22	15	action item from March 5th, 2010 from the	22	7	MR. CHALOS: I wonder if I could ask a
23	16	vessel, GEA. It says, "During review of the	23	8	question.
24	17	garbage book, it was verified that time of	24	9	Is there somebody in your office that's
25	18	start and stop of incinerator was not recorded,	25	10	assigned the task of following up to make sure
-					
		Page 43			Page 45
1	19	and one of the items was to get random copies	1	11	things are being done?
2	20	of the garbage book will be requested from	2	12	MS. TSOCHLAS: Yes. The safety and
3	21	vessels in order to verify that the specific	3	13	quality department maintains the database of
4	22	entries are carried out as per MARPOL	4	14	all the observations that are issued to the
5	23	requirements."	5	15	vessels, whether it's from third parties or
6	24	The question is, did that happen and has	6	16	internally, and at the end of each month, she
7	25	there been any discrepancies with the random	7	17	reviews a list of actions, according to the due
8 9			8		data and then new cots confirmation sites.
	DEL	VECCUIO DEDODTINO		18	date, and then requests confirmation, either
		. VECCHIO REPORTING	9	19	through the responsible department, some items
10		203) 245-9583	9 10	19 20	through the responsible department, some items are monitored by the technical department, for
10 11	(203) 245-9583 37	9 10 11	19 20 21	through the responsible department, some items are monitored by the technical department, for example, or directly from the vessel. When she
10 11 12	1	203) 245-9583 37 books that were requested?	9 10 11 12	19 20 21 22	through the responsible department, some items are monitored by the technical department, for example, or directly from the vessel. When she receives that confirmation from the vessels or
10 11 12 13	1 2	203) 245-9583 37 books that were requested? MS. TSOCHLAS: That did happen and there	9 10 11 12 13	19 20 21 22 23	through the responsible department, some items are monitored by the technical department, for example, or directly from the vessel. When she receives that confirmation from the vessels or the other departments, we review all of the
10 11 12 13 14	1 2 3	203) 245-9583 37 books that were requested? MS. TSOCHLAS: That did happen and there weren't any discrepancies identified when	9 10 11 12 13 14	19 20 21 22 23 24	through the responsible department, some items are monitored by the technical department, for example, or directly from the vessel. When she receives that confirmation from the vessels or the other departments, we review all of the confirmation together in order to ensure that
10 11 12 13 14 15	1 2 3 4	203) 245-9583 37 books that were requested? MS. TSOCHLAS: That did happen and there weren't any discrepancies identified when requested when the copies were requested	9 10 11 12 13 14 15	19 20 21 22 23	through the responsible department, some items are monitored by the technical department, for example, or directly from the vessel. When she receives that confirmation from the vessels or the other departments, we review all of the
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		Page 46			Page 48
1	7	close it out effectively within the timeframe,	1	(203) 245-9583
2	8	and then we provide an extension so that we can	2	`	, 41
3	9	continue to monitor it effectively, and the	3	1	because when he signed on, he was serving under
4	10	status with a reference to the evidence that's	4	2	a different engineer, chief engineer, so we
5	11	been provided, because we request evidence for	5	3	can't establish why that chief engineer did not
6	12	the closing out of all items.	6	4	request from him to complete the fleet
7	13	MR. SANBORN: Thank you. That's where I	7	5	engineering survey. In the meantime, he had
8	14	was headed.	8	6	also signed off, the third engineer had signed
9	15	SPECIAL MASTER BUNDY: Has this procedure	9	7	off the vessel, so we couldn't request it
10	16	that you've described, I assume since you	10	8	because it wasn't onboard the vessel. So,
11	17	didn't say that it was in place before, that	11	9	that's why the corrective action is being
12	18	also was implemented since 2000?	12	10	carried out. The preventive action is to
13	19	THE WITNESS: The process has been in	13	11	establish a more detailed monitoring system in
14	20	place; it's become very meticulous, though,	14	12	order to prevent omissions of this kind. So,
15	21	we've enhanced it, and the database, for	15	13	the technical department is responsible for
16	22	example, wasn't in place before, before I came	16	14	ensuring that the fleet engineering did the
17	23	to the company.	17	15	survey, is completed by all officers, per
18	24	SPECIAL MASTER BUNDY: So, just to back up	18	16	requirements, within three months of signing
19	25	for a minute. When did you come to the	19	17	on, and the crew department is required to
20			20	18	advise the technical department whenever there
21	DEL	VECCHIO REPORTING	21	19	is a change in the officers so that they can
22	(2	203) 245-9583	22	20	follow up properly.
23		40	23	21	So, that process wasn't quite adequate to
24	1	company?	24	22	make sure that the technical department could
25	2	MS. TSOCHLAS: In May of 2008.	25	23	follow up and we've improved that process now.
		Page 47			Page 49
1	3	Page 47 MR. O'CONNELL: Number	1	24	Page 49 MR. CHALOS: Does every engineering
	3	Page 47 MR. O'CONNELL: Number MR. CHALOS: Welcome onboard.	1 2	24 25	MR. CHALOS: Does every engineering
1 2 3		MR. O'CONNELL: Number MR. CHALOS: Welcome onboard.			-
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2 3	4 5	MR. O'CONNELL: Number MR. CHALOS: Welcome onboard.	2	25 DEL	MR. CHALOS: Does every engineering officer on your vessels complete these surveys?
2 3 4	4 5 6	MR. O'CONNELL: Number MR. CHALOS: Welcome onboard. MR. O'CONNELL: I see they keep you fully employed.	2 3 4	25 DEL	MR. CHALOS: Does every engineering officer on your vessels complete these surveys? VECCHIO REPORTING
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	MR. O'CONNELL: Number MR. CHALOS: Welcome onboard. MR. O'CONNELL: I see they keep you fully employed. MS. TSOCHLAS: They do, they keep me very busy. MR. O'CONNELL: Number 32 for the KRITON. MS. TSOCHLAS: Hold on. It's a little bit further down. MR. O'CONNELL: This is from recently, July 10th, 2011. There's no evidence onboard that the fleet engineering survey form ENV 015 has been completed by the offside third engineer, although he signed I guess he signed the survey on July 2010, and it says, the cause is unknown, possibly a minute. MS. TSOCHLAS: The third engineer signed on the vessel in July of 2010. By the time of the audit, which was a year later, we required that the fleet engineering survey is completed within three months of signing on, and he hadn't completed that. The reason that the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	25 DELL (1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. CHALOS: Does every engineering officer on your vessels complete these surveys? VECCHIO REPORTING 203) 245-9583 42 MS. TSOCHLAS: Yes. MR. CHALOS: So, this is one officer on this one ship that didn't do it? MS. TSOCHLAS: Exactly. MR. O'CONNELL: The number I think the last one I have is number 37, which is the KRITON again, from July of 2011, that has to do with the environmental tag seal system. MS. TSOCHLAS: Yes. MR. O'CONNELL: Correct me if I'm wrong, but I believe from the last time there was another issue with seals. Mr. Wigger, do you know, regarding the seal log system, on was it the PLOUTOS? MR. WIGGER: It wasn't the PLOUTOS, but it was in one of our audits. I know the seal log records were not correct.

		Page 50			Page 52
1	20	auditor found some quite a few discrepancies	1	12	is to do with recordkeeping. That's why some
2	21	and required a complete review of the seals and	2	13	of them overlap because it could be
3	22	correction. So that, I believe, was on the	3	14	recordkeeping of the mitigation measures.
4	23	ESTIA.	4	15	MR. O'CONNELL: Okay. Well, we could do
5	24	MR. O'CONNELL: So, the action says this	5	16	this all at once or we can
6	25	was distributed a fleet of has Ionia gone	6	17	SPECIAL MASTER BUNDY: Let's wait until
7			7	18	the end, because they do overlap, because some
8	DEL	VECCHIO REPORTING	8	19	of the minimum engineering standards involve
9	(2	203) 245-9583	9	20	recordkeeping
10		43	10	21	MR. O'CONNELL: I just want to do it all
11	1	back out to the fleet and made a determination	11	22	at once, so it will be more efficient.
12	2	if there's any other discrepancies?	12	23	SPECIAL MASTER BUNDY: So, you can do
13	3	MS. TSOCHLAS: We have requested	13	24	that.
14	4	confirmation from the vessels and all vessels	14	25	Go onto the next slide.
15	5	have confirmed that they have checked the	15		
16	6	environmental seal system in detail in order to	16	DEL	. VECCHIO REPORTING
17	7	ensure that it is in order, and now we're in	17	(203) 245-9583
18	8	the process of making sure that when	18		45
19	9	superintendent engineers go onboard, they're	19	1	MS. TSOCHLAS: So, the next slide of the
20	10	following up on that.	20	2	agenda.
21	11	MR. CHALOS: Mr. O'Connell, if I could	21	3	So, this item has to do with the
22	12	make a comment.	22	4	maintenance of shipboard records in accordance
23	13	The KRITON is operating in West Africa	23	5	with paragraph 4A of the Special Master's scope
24	14	right now and sometimes it's very difficult to	24	6	of work. Here again, we'll also look into the
25	15	get people onboard because of the physical	25	7	findings made during the internal audits
		Page 51			Page 53
1	16	location, but they're following that vessel	1	8	carried out by Ionia and the findings made by
2	17	very closely as well.	2	9	the IEC during his shipboard audits carried out
3	18	MR. O'CONNELL: I didn't have anymore	3	10	onboard our vessels.
4	19	questions on that spreadsheet.	4	11	So, the first thing I've done here in this
5	20	Now, the second spreadsheet is	5	12	presentation is to summarize the paragraphs of
6	21	MS. TSOCHLAS: Are the findings made by	6	13	4A of the scope of work.
7	22	Captain Wigger?	7	14	The scope of work requires that the
8	23	MR. O'CONNELL: Okay. And, I'm sorry,	8	15	following records are to be maintained onboard
9	24	there's another spreadsheet at the end, I'm	9	16	our vessels.
10	25	just asking this because I want to figure out	10	17	The daily tank soundings of all waste oil
11			11	18	and oily water waste tanks. Oil record book
12		VECCHIO REPORTING	12	19	part one entries, and engine room alarm
13	(2	203) 245-9583	13	20	printouts.
14		44	14	21	If we move to the next slide, we have a
15	1	if we should do this now or at the end.	15	22	summary of the nonconformities issued during
16	2	The last spreadsheet in the presentation,	16	23	the internal audits carried out onboard our
17	3	is that it seemed like there was a lot of	17	24	vessels. Yet, again, this is for the entire
18	4	the same	18	25	period on all of our vessels that the internal
19	5	THE WITNESS: Some things were overlapping	19		
20	6	because they are common topics.	20	DEI	_ VECCHIO REPORTING
21	7	MR. O'CONNELL: And the last spreadsheet	21	((203) 245-9583
22	8	refers to what?	22		46
23	9	MS. TSOCHLAS: To the requirements, the	23	1	audits have been carried out.
		minimum rick mitigating mitigation massures	24	2	SPECIAL MASTER BUNDY: This includes
24	10	minimum risk mitigating mitigation measures	24	2	SECTAL MASTER DUNDT. THIS INCIDUES
24 25	10 11	of the scope of work. Whereas, this first one	25	3	vessels that are not included under

		Page 54			Page 56
1	4	MS. TSOCHLAS: All six vessels. Because	1	25	preventive actions.
2	5	we may not have them included in the terms of	2		'
3	6	the coverage, but we're implementing a uniform	3	DEL	VECCHIO REPORTING
4	7	system onboard our vessels so that we can have	4	(2	203) 245-9583
5	8	a uniform culture of compliance.	5	,	48
6	9	SPECIAL MASTER BUNDY: Those vessels would	6	1	So, do you want to have a look at it right
7	10	be the GEA and the KRITON?	7	2	now or
8	11	THE WITNESS: And the KRITON, yes.	8	3	SPECIAL MASTER BUNDY: Unless there's any
9	12	I've divided the summary into the three	9	4	questions about this, we'll just defer that
10	13	records that are required by the scope of work	10	5	till we talk about all the spreadsheets, if
11	14	to be maintained.	11	6	that's agreeable with Mr. O'Connell?
12	15	The first one is the daily tank sounding	12	7	MR. O'CONNELL: That's fine. I think that
13	16	log. So, the daily tank soundings were not	13	8	would be best.
14	17	recorded in the company's controlled form; that	14	9	MS. TSOCHLAS: If we go to the next slide,
15	18	was one of the nonconformities at the time that	15	10	we have a summary of the findings issued by the
16	19	was identified.	16	11	IEC during the environmental audits.
17	20	When it comes to engine room alarm	17	12	I'd like to here it says
18	21	printouts, the alarm printouts were not	18	13	nonconformities, but Captain Wigger has made
19	22	initialed and dated by the chief engineer upon	19	14	very clear in all of his reports that the
20	23	his weekly review of those, as required by the	20	15	recommendations that were identified did not
21	24	scope of work.	21	16	constitute nonconformities, they were
22	25	And then the oil record book part one.	22	17	recommendations for improvement of our system.
23		'	23	18	SPECIAL MASTER BUNDY: As you go through
24	DEL \	VECCHIO REPORTING	24	19	these, I don't think you will need to read each
25	(2	03) 245-9583	25	20	one of them. If you just do this is a
1		Page 55	1	21	Page 57
1	1	47	1	21	summary and we've all, I think, gone through
2	1	47 Various discrepancies, such as information	2	22	summary and we've all, I think, gone through this before the hearings, so we're familiar
2	2	47 Various discrepancies, such as information related to tanks not included in form B of the	2	22 23	summary and we've all, I think, gone through this before the hearings, so we're familiar with that.
2 3 4	2	47 Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part	2 3 4	22 23 24	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the
2 3 4 5	2 3 4	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our	2 3 4 5	22 23	summary and we've all, I think, gone through this before the hearings, so we're familiar with that.
2 3 4 5 6	2 3 4 5	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines.	2 3 4 5 6	22 23 24 25	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the
2 3 4 5 6 7	2 3 4 5 6	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding	2 3 4 5 6 7	22 23 24 25 DEL	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING
2 3 4 5 6 7 8	2 3 4 5 6 7	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not	2 3 4 5 6 7 8	22 23 24 25 DEL	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583
2 3 4 5 6 7 8 9	2 3 4 5 6 7 8	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded.	2 3 4 5 6 7 8 9	22 23 24 25 DEL (:	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49
2 3 4 5 6 7 8 9	2 3 4 5 6 7 8 9	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded. Discrepancies were identified related to	2 3 4 5 6 7 8 9	22 23 24 25 DEL (3	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49 daily tank sounding log, which you can see
2 3 4 5 6 7 8 9 10	2 3 4 5 6 7 8 9 10	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded. Discrepancies were identified related to data concerning transfers of waste in the	2 3 4 5 6 7 8 9 10 11	22 23 24 25 DEL (:	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49 daily tank sounding log, which you can see here. The oil record book part one. The
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	2 3 4 5 6 7 8 9 10 11 12 13 14	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded. Discrepancies were identified related to data concerning transfers of waste in the engine room were not recorded in the oil there were discrepancies in the oil record book. Entries regarding the operation of the	2 3 4 5 6 7 8 9 10 11 12 13 14 15	22 23 24 25 DEL (3 1 2 3 4 5 6	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49 daily tank sounding log, which you can see here. The oil record book part one. The issues that were identified in the recording in the oil record book part one, and the oil record book part two. When it comes to engine room alarm
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded. Discrepancies were identified related to data concerning transfers of waste in the engine room were not recorded in the oil there were discrepancies in the oil record book. Entries regarding the operation of the oily water separator and the incinerator were	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	22 23 24 25 DEL (: 1 2 3 4 5 6 7	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49 daily tank sounding log, which you can see here. The oil record book part one. The issues that were identified in the recording in the oil record book part one, and the oil record book part two. When it comes to engine room alarm printouts, no discrepancies or deficiencies
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Various discrepancies, such as information related to tanks not included in form B of the IOPP was entered into the oil record book part one. Obviously, not in accordance with our guidelines. Entries in the oil record book regarding the cleaning of the bilge holding tank had not been recorded. Discrepancies were identified related to data concerning transfers of waste in the engine room were not recorded in the oil there were discrepancies in the oil record book. Entries regarding the operation of the oily water separator and the incinerator were not recorded in the oil record book.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	22 23 24 25 DEL (3 1 2 3 4 5 6 7 8	summary and we've all, I think, gone through this before the hearings, so we're familiar with that. MS. TSOCHLAS: So, I've done this in the same way, I've divided the summary into the VECCHIO REPORTING 203) 245-9583 49 daily tank sounding log, which you can see here. The oil record book part one. The issues that were identified in the recording in the oil record book part one, and the oil record book part two. When it comes to engine room alarm printouts, no discrepancies or deficiencies were identified by Captain Wigger in the engine
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		Page 58			Page 60
1	17	MS. TSOCHLAS: Okay. So, are we moving	1	9	of the oily water separator, the status of the
2	18	on?	2	10	overall discharge valve. The average PPM
3	19	SPECIAL MASTER BUNDY: Yes.	3	11	overboard in the event a discharge has taken
4	20	MS. TSOCHLAS: Now, if we go to the next	4	12	place and the operation of the incinerator.
5	21	item of the agenda, this is the installation	5	13	So, if we click on that attachment, you'll see
6	22	and maintenance of the SWOMS in accordance with	6	14	the report as it's received in our offices.
7	23	paragraph 4B of the scope of work.	7	15	SPECIAL MASTER BUNDY: This is a report
8	24	If we move to the next slide, I've first	8	16	that comes every hour?
9	25	made a summary of the requirements of the scope	9	17	MS. TSOCHLAS: Yes, every hour. It's the
10			10	18	hourly role.
11	DEL	VECCHIO REPORTING	11	19	SPECIAL MASTER BUNDY: And so, you have
12	(2	203) 245-9583	12	20	one of those for every vessel with the SWOMS
13		50	13	21	for every hour of every day?
14	1	of work with regards to the installation of the	14	22	MS. TSOCHLAS: Exactly.
15	2	SWOMS onboard the vessel.	15	23	SPECIAL MASTER BUNDY: And that's
16	3	Now, the SWOMS installed onboard our	16	24	contained in I assume you don't print these
17	4	vessels must have the capabilities to record	17	25	out and put them in a big book.
18	5	all waste oil generation and processing in the	18		out und put them in a sig sook.
19	6	engine room in a tamperproof and automated	19	DFI	. VECCHIO REPORTING
20	7	manner. The data must be recorded and sent	20		203) 245-9583
21	8	electronically to our officers without the need	21	(52
22	9	for human intervention. Data must be recorded	22	1	MS. TSOCHLAS: That wouldn't be
23	10	on an hourly basis and in a manner that allows	23	2	environmentally friendly.
24	11	it to be compared to shipboard records that are	24	3	SPECIAL MASTER BUNDY: You keep them in a
25	12	maintained by us.	25	3 4	-
25	12	maintained by us.	25	4	server if a discrepancy appears that you need
		Page 59			Page 61
1	13	If we move onto the next slide, I'll begin	1	5	to look at these in detail?
2	14	with specifications of the units that have been	2	6	MS. TSOCHLAS: Exactly.
3	15	installed onboard our vessels.	3	7	SPECIAL MASTER BUNDY: I'll go into more
4	16	The SWOMS, as we all know, were designed	4	8	detail about how we carry out the analysis in
5	17	by Vigilant Marine; it's a custom design in	5	9	the next slide.
6	18	accordance with our requirements and the scope	6	10	MR. CHALOS: I wonder if I could ask a
7	19	of work and it monitors and records operations	7	11	question. Is there someone assigned in the
8	20	of the vessel's oily water separator	8	12	office to review these reports?
9	21	incinerator, the level of the oily bilge	9	13	MS. TSOCHLAS: There is a person that's
10	22	holding tank, sludge tanks, waste oil tank and			·
		S S	10	14	assigned to monitor that they are received as
11	23	bilge wells. The SWOMS monitor all operations	11	15	required and reviewed. I'll go into more
12	24	and tanks continuously throughout the 24 hours.	12	16	detail on the next slides on who that is and
13	25	A report is generated on an hourly basis and is	13	17	how he does it.
14	סבי	VECCINO DEPONTINO	14	18	MR. CHALOS: Sorry.
15		VECCHIO REPORTING	15	19	SPECIAL MASTER BUNDY: Listen to your
16	((203) 245-9583	16	20	witness, Mr. Chalos.
17	4	51	17	21	MR. CHALOS: A problem I've had all my
18	1	sent to our officers without the need for human	18	22	career.
19	2	intervention automatically; that report	19	23	MS. TSOCHLAS: So, if we go to the next
20	3	includes the date, the time that it's being	20	24	slide, another report is generated every 24
21	4	transmitted, the vessel's position at the time	21	25	hours and is also transmitted electronically to
22	5	of transmission, the current levels in the	22	_	
23	6	tanks levels and volumes in the tank in the	23		_ VECCHIO REPORTING
24	7	engine room at the time of the transmission,	24	((203) 245-9583
25	8	the operation of the bilge pump, the operation	25		53
Ī					

1	1	Page 62 Ionia without the need for human intervention.	1	22	Page 64
2	2	That includes the date, the time of	2	23	doing the comparisons or they were MS. TSOCHLAS: We have been aware of all
3	3	transmission, the vessel's position at the time	3	24	of those discrepancies because usually the
4	4	of transmission, the current tank levels and	4	25	discrepancies have been due to the calibration
5	5	volumes, the operation of the bilge pump	5	23	discrepancies have been due to the calibration
6	6	throughout the 24 hours, the operation of the	6	DFI	. VECCHIO REPORTING
7	7	oily water separator throughout the 24 hours,	7		203) 245-9583
8	8	the status of the overboard discharge valve	8	`	55
9	9	within that 24 hours; how many times it's been	9	1	of the SWOMS, the sounding of the SWOMS, and
10	10	opened and closed, the status of the PP alarm	10	2	the chief engineer is required to compare the
11	11	throughout the 24 hours. The average PPM	11	3	readings on a daily basis, and in the event
12	12	overboard in the event that a discharge took	12	4	that he finds that there is a major discrepancy
13	13	place. The status of the oil content meters	13	5	above the level of tolerance, which is a five
14	14	fresh water valve, and the oil purge valve, and	14	6	percent difference, he's required to report it
15	15	the minimum and maximum tank levels and volumes	15	7	directly to the CCM, Mr. Karagiorgis, so we can
16	16	throughout that 24 hours.	16	8	arrange for a technician to go onboard and
17	17	So, if we click on the attachment, we have	17	9	calibrate the SWOMS units.
18	18	an example of that report.	18	10	SPECIAL MASTER BUNDY: So, the chief
19	19	This is the report that is reviewed to	19	11	engineer then, if he identifies every day
20	20	compare with the documentation that's submitted	20	12	this report is also printed out onboard?
21	21	by the vessel on a monthly basis.	21	13	MS. TSOCHLAS: Yes. It's not printed out,
22	22	SPECIAL MASTER BUNDY: So, the technical	22	14	but he is able to compare it.
23	23	manager in your the technical superintendent	23	15	SPECIAL MASTER BUNDY: And he then looks
24	24	in your office will take each one of these	24	16	at his own people's soundings, and if he sees a
25	25	daily reports and compare it to the oil records	25	17	difference, what does he do, does he go and
					•
		Page 63			Page 65
1		Page 63	1	18	Page 65 verify the soundings with the people to make
1 2	DEL	Page 63 VECCHIO REPORTING	1 2	18 19	
		VECCHIO REPORTING 203) 245-9583		19 20	verify the soundings with the people to make
2 3 4		VECCHIO REPORTING	2	19 20 21	verify the soundings with the people to make sure that the sounding was accurate? MS. TSOCHLAS: Yes. SPECIAL MASTER BUNDY: And then at that
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	DVECCHIO REPORTING 203) 245-9583 54 book, say, or the alarm. MS. TSOCHLAS: And the tank soundings. And all of this documentation is provided to everybody here. MR. O'CONNELL: Could I ask a question? SPECIAL MASTER BUNDY: Yes. MR. O'CONNELL: What happens when there is a discrepancy? MS. TSOCHLAS: The CCM, Mr. Karagiorgis, initiates an investigation. MR. O'CONNELL: And has that occurred on any occasion? MS. TSOCHLAS: Minor discrepancies have been identified, but the investigation hasn't led to if there's been an anomaly in an	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	19 20 21 22 23 24 25 DEL (1 2 3 4 5 6 7	verify the soundings with the people to make sure that the sounding was accurate? MS. TSOCHLAS: Yes. SPECIAL MASTER BUNDY: And then at that point, he would report that to Mr. Karagiorgis? MS. TSOCHLAS: Yes. MR. O'CONNELL: My question is a little different, it's independent of what the chief VECCHIO REPORTING (203) 245-9583 56 engineer is doing onboard, shoreside they're getting this data hourly and daily and then a comparison is made, is there an effort shoreside to determine if the data they're getting from the sounding books off the vessel are matching up? MS. TSOCHLAS: Yes. The comparison is
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	DVECCHIO REPORTING 203) 245-9583 54 book, say, or the alarm. MS. TSOCHLAS: And the tank soundings. And all of this documentation is provided to everybody here. MR. O'CONNELL: Could I ask a question? SPECIAL MASTER BUNDY: Yes. MR. O'CONNELL: What happens when there is a discrepancy? MS. TSOCHLAS: The CCM, Mr. Karagiorgis, initiates an investigation. MR. O'CONNELL: And has that occurred on any occasion? MS. TSOCHLAS: Minor discrepancies have been identified, but the investigation hasn't led to if there's been an anomaly in an operation, it's generally due to a clerical error, something along those lines. MR. O'CONNELL: So, there's been instances	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	19 20 21 22 23 24 25 DEL (1 2 3 4 5 6 7 8 9	verify the soundings with the people to make sure that the sounding was accurate? MS. TSOCHLAS: Yes. SPECIAL MASTER BUNDY: And then at that point, he would report that to Mr. Karagiorgis? MS. TSOCHLAS: Yes. MR. O'CONNELL: My question is a little different, it's independent of what the chief VECCHIO REPORTING (203) 245-9583 56 engineer is doing onboard, shoreside they're getting this data hourly and daily and then a comparison is made, is there an effort shoreside to determine if the data they're getting from the sounding books off the vessel are matching up? MS. TSOCHLAS: Yes. The comparison is carried out. We have a spreadsheet that assists the person reviewing the data to see to identify easily the discrepancies, and

		David (4)			D
1	14	Page 66 we've been fully aware of them right from the	1	6	Page 68 the SWOMS. So, we can always know in what
2	15	start.	2	7	position, whether it's opened or closed.
3	16	SPECIAL MASTER BUNDY: One of the	3	8	The SWOMS is also connected to a GPS
4	17	questions I have is, have you identified any	4	9	antenna, so that we are provided with the exact
5	18	discrepancies from, say, the monthly review	5	10	position of the vessel at the time of opening
6	19	when you get the vessel's documents that were	6	11	and closing of the valve.
7	20	not already identified by the chief engineer in	7	12	The next slide shows the layout of the
8	21	his daily comparison? For instance, when	8	13	SWOMS onboard our vessels, this has been
9	22	you've had a calibration problem or some other	9	14	prepared by Vigilant Marine Systems, and here
10	23	problem where the soundings do not match up?	10	15	you can see how the Enviro-Logger of the main
11	24	MS. TSOCHLAS: No, that's usually	11	16	panel is connected to the bilges and the sludge
12	25	immediately identified by the chief engineer	12	17	and oil tank, it's also connected to a GPS, the
13		, ,	13	18	oily water separator, the oil content meter,
14	DEL V	/ECCHIO REPORTING	14	19	the overboard valve position, the bilge holding
15		03) 245-9583	15	20	tank transfer, the oily water separator
16	•	57	16	21	controls, and the incinerator, the sludge pump
17	1	and immediately reported.	17	22	and the waste oil tank. So, you can see how
18	2	SPECIAL MASTER BUNDY: Have there been any	18	23	that was setup onboard our vessels. This was
19	3	situations where the chief engineer is not	19	24	prepared for the THEO T, it's the same for all
20	4	MS. TSOCHLAS: No, I can pretty safely say	20	25	four vessels.
21	5	we've been aware right from the start of any	21		
22	6	calibration problem or discrepancy problem	22	DEL	VECCHIO REPORTING
23	7	between soundings between the manual	23	(2	203) 245-9583
24	8	soundings and the SWOMS readings.	24		59
25	9	SPECIAL MASTER BUNDY: Thank you.	25	1	SPECIAL MASTER BUNDY: Was this prepared
		Page 67			Page 69
1	10	MS. TSOCHLAS: So, shall we move to the	1	2	by Vigilant Marine?
2	11	next slide?	2	3	MS. TSOCHLAS: Yes, this was prepared by
3	12	Now, the system utilizes a tamperproof	3	4	\footballent NA aring
4				4	Vigilant Marine.
	13	lockbox, which secures the sample of the oil	4	5	MR. CHALOS: Mr. Bundy, I wonder if I
5	13 14	lockbox, which secures the sample of the oil content meter and controls the overboard			<u> </u>
5 6		•	4	5	MR. CHALOS: Mr. Bundy, I wonder if I
5 6 7	14	content meter and controls the overboard	4	5	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question.
6	14 15	content meter and controls the overboard discharge valve. This lockbox controls and	4 5 6	5 6 7 8 9	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question. Captain Wigger, you've been onboard the
6 7 8 9	14 15 16 17 18	content meter and controls the overboard discharge valve. This lockbox controls and verifies that there's an adequate sample quantity flowing through the oil content meter, so it can make an accurate reading, so that the	4 5 6 7 8 9	5 6 7 8 9 10	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question. Captain Wigger, you've been onboard the vessels, you've done the audit and some of your folks have done the audit, is what Miss Tsochlas is talking about here with regard to
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6 7 8 9 10 11	14 15 16 17 18 19 20	content meter and controls the overboard discharge valve. This lockbox controls and verifies that there's an adequate sample quantity flowing through the oil content meter, so it can make an accurate reading, so that the sample has had adequate time to be measured by the oil content meter and that the flushing	4 5 6 7 8 9 10 11	5 6 7 8 9 10 11 12	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question. Captain Wigger, you've been onboard the vessels, you've done the audit and some of your folks have done the audit, is what Miss Tsochlas is talking about here with regard to how the system works with the lockbox and the ability for the system to shutdown, the system
6 7 8 9 10 11 12	14 15 16 17 18 19 20 21	content meter and controls the overboard discharge valve. This lockbox controls and verifies that there's an adequate sample quantity flowing through the oil content meter, so it can make an accurate reading, so that the sample has had adequate time to be measured by the oil content meter and that the flushing fresh water to the content meter is not mixed	4 5 6 7 8 9 10 11 12	5 6 7 8 9 10 11 12 13	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question. Captain Wigger, you've been onboard the vessels, you've done the audit and some of your folks have done the audit, is what Miss Tsochlas is talking about here with regard to how the system works with the lockbox and the ability for the system to shutdown, the system is now working and functioning properly, have
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	14 15 16 17 18 19 20 21 22 23 24 25 DEL V	content meter and controls the overboard discharge valve. This lockbox controls and verifies that there's an adequate sample quantity flowing through the oil content meter, so it can make an accurate reading, so that the sample has had adequate time to be measured by the oil content meter and that the flushing fresh water to the content meter is not mixed with the sample water. So, this lockbox ensures that it's tamperproof, the oil content meter is tamperproof. In the event that the lockbox detects any /ECCHIO REPORTING 03) 245-9583 58 irregularities regarding the proper function of the oil content meter and the oily water	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. CHALOS: Mr. Bundy, I wonder if I could ask Captain Wigger a question. Captain Wigger, you've been onboard the vessels, you've done the audit and some of your folks have done the audit, is what Miss Tsochlas is talking about here with regard to how the system works with the lockbox and the ability for the system to shutdown, the system is now working and functioning properly, have you observed that and is it working as represented? MR. WIGGER: During the audits we do carry out an operational test of the U.S., we inspect the system and make sure the piping arrangement is as indicated on the approved plans. The lockbox itself is a sealed box, but the system as it's designed has the safeguards for preventing dilution, continuous sample flow. So, we verify that as part of the operational
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		Dags 70			Dava 72
1	DFI	Page 70 VECCHIO REPORTING	1	19	Page 72 it would be stupid to take it off. But beyond
2		203) 245-9583	2	20	that, it provides us with extra protection to
3	(2	60	3	21	ensure that our vessels will continue to be
4	1	The only real and I think it's been	4	22	compliant with environmental standards because
5	2	discussed at previous hearings, the only real	5	23	these are probation requirements, and that's
6	3	discrepancies we've come up with is the	6	24	why we're implementing them, but it's equally
7	4	calibration on some of the tanks and that seems	7	25	important for us to maintain a high standard of
8	5	to be an ongoing process. And I think on other	8	23	important for us to maintain a high standard of
9	6	tanks, at least one tank due to size of the	9	DEI	VECCHIO REPORTING
10	7	tank itself, it was very difficult to measure,	10		203) 245-9583
11	8	that was the incinerator waste oil tank, I	11	(2	62
12	9	think. But the OWS itself, we've had, I think,	12	1	environmental compliance because, obviously,
13	10	I believe we haven't had any real discrepancies	13	2	it's cost the company a lot over the years, and
14	11	on the testing of the OWS and the operation of	14	3	we really don't want that to ever happen again.
15	12	this lockbox.	15	4	SPECIAL MASTER BUNDY: Mr. O'Connell.
16	13	SPECIAL MASTER BUNDY: This might be a	16	5	MR. O'CONNELL: While we're on the SWOMS
17	14	time to ask about to follow-up, over the last	17	6	system, there's the issue, though, of waste oil
18	15	few years since the SWOMS have been developed,	18	7	tank, is that still ongoing? I guess there was
19	16	it seems to me that the biggest problem that's	19	8	problems with the calibration of that tank
20	17	occurred has been these calibration issues and	20	9	that's continued throughout?
21	18	all of that.	21	10	MS. TSOCHLAS: We have found a solution to
22	19	Are you satisfied that the things are	22	11	that and we have improved the readings, the
23	20	working okay now? If you were to redesign this	23	12	capability of the system to carry out the
24	21	thing, would you change anything?	24	13	sound the proper sounding of the tank.
25	22	MS. TSOCHLAS: The things I think we	25	14	MR. O'CONNELL: What was the solution?
23	22	IVIS. 1300HEAS. THE things I think we	23	14	with O Commetter. What was the solution:
		Page 71			Page 73
1	23	have smooth out a lots of problems, as you are	1	15	MS. TSOCHLAS: Mr. Karagiorgis can explain
2	24	all well aware, the problem with calibration is	2	16	it better, I think.
3	25	an ongoing problem, and it will continue to be	3	17	MR. KARAGIORGIS: So, last August, these
4			4	18	young ladies and gentlemen went aboard the
5		VECCHIO REPORTING	5	19	vessel, THEO T, so they spent a couple of days
6	(2	203) 245-9583	6	20	onboard the vessel and he did some special
7		61	7		·
8	1		l ′	21	equipment, because the job of this tanker
l		an ongoing problem because this is a machine,	8	22	equipment, because the job of this tanker produced some problem, so he did some changes
9	2	machines all have issues, and it's the same as	8 9	22 23	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he
9 10		machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a	8 9 10	22 23 24	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he
9 10 11	2 3 4	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they	8 9 10 11	22 23	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he
9 10 11 12	2 3 4 5	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's	8 9 10 11 12	22 23 24 25	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and
9 10 11 12 13	2 3 4 5 6	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's something we have to monitor closing and we're	8 9 10 11 12 13	22 23 24 25 DEL	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and VECCHIO REPORTING
9 10 11 12 13 14	2 3 4 5 6 7	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's something we have to monitor closing and we're working with Vigilant Marine continuously to	8 9 10 11 12 13 14	22 23 24 25 DEL	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and VECCHIO REPORTING 203) 245-9583
9 10 11 12 13 14 15	2 3 4 5 6 7 8	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's something we have to monitor closing and we're working with Vigilant Marine continuously to improve it to the best we can.	8 9 10 11 12 13 14 15	22 23 24 25 DEL (2	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and VECCHIO REPORTING 203) 245-9583
9 10 11 12 13 14 15 16	2 3 4 5 6 7 8	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's something we have to monitor closing and we're working with Vigilant Marine continuously to improve it to the best we can. SPECIAL MASTER BUNDY: Does Vigilant	8 9 10 11 12 13 14 15 16	22 23 24 25 DEL (2	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and VECCHIO REPORTING 203) 245-9583 63 we have now improved the system. There's no
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9 10 11 12 13 14 15 16 17 18 19 20 21 22	2 3 4 5 6 7 8 9 10 11 12 13 14 15	machines all have issues, and it's the same as with the cargo tanks. Cargo tanks have a similar system for monitoring our levels, they also produce calibration problems. So, it's something we have to monitor closing and we're working with Vigilant Marine continuously to improve it to the best we can. SPECIAL MASTER BUNDY: Does Vigilant Marine also provide your cargo tank? MS. TSOCHLAS: No, that's a totally separate system. SPECIAL MASTER BUNDY: I guess that brings us to the next question then, if probation is over in December, what are Ionia's plans with	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	22 23 24 25 DEL (2 1 2 3 4 5 6 7	equipment, because the job of this tanker produced some problem, so he did some changes and he did a lot of experiments. I mean, he heated up the tank, he cooldown the tank, he did a lot of changes inside the pair meters and VECCHIO REPORTING 203) 245-9583 63 we have now improved the system. There's no problem so far, since August. MR. O'CONNELL: So, since August you're getting consistent readings in the waste water? MR. KARAGIORGIS: Yes. MR. WIGGER: During the audit of the PLOUTOS, Mr. Karagiorgis was onboard as well,

1	11	Page 74 problem is only onboard the THEO T and the	1	3	Page 76 The frames does not allow us to install the
2	12	FIDIAS, because there's more volume of this	2	4	sensors. It's very
3	13	tank.	3	5	MS. TSOCHLAS: It's not practical.
4	14	MR. WIGGER: So, we did have successful	4	6	MR. WIGGER: I think the size of the tank
5	15	soundings comparison between the SWOMS and	5	7	is less than one cube.
6	16	manual on board the PLOUTOS with this	6	8	SPECIAL MASTER BUNDY: Everybody remember
7	17	particular tank, as Mr. Karagiorgis just	7	9	the Court Reporter is trying to take us down.
8	18	mentioned, the geometry and the size of the	8	10	MR. O'CONNELL: Thank you.
9	19	tank and everything else was different, so.	9	11	SPECIAL MASTER BUNDY: Okay. Thank you.
10	20	MS. TSOCHLAS: As far as I remember, it	10	12	MS. TSOCHLAS: Shall we move onto the next
11	21	was the PLOUTOS for all the tanks, it was	11	13	one?
12	22	spot on?	12	14	SPECIAL MASTER BUNDY: Go back to the
13	23	MR. WIGGER: It was spot on. Yes, it was	13	15	PowerPoint.
14	24	well within the five percent.	14	16	MS. TSOCHLAS: The last item of this part
15	25	MR. O'CONNELL: The only other question I	15	17	of the agenda is the current status of the
16			16	18	SWOMS installed onboard our vessels. We've
17	DEL	VECCHIO REPORTING	17	19	installed the SWOMS on four of our vessels.
18	(2	203) 245-9583	18	20	The date of commissioning was carried out
19	,	64	19	21	between 2009 and 2010 on all four of our
20	1	had with the SWOMS system was I think Mr.	20	22	vessels and when we say the date of
21	2	Wigger had recommended that the fuel oil	21	23	commissioning, from the time of commissioning,
22	3	overflow tank and the scavenger drain tank, I	22	24	the SWOMS have been continuously monitoring all
23	4	don't know if I have that right, be part of the	23	25	waste management and transmitting data to the
24	5	system, and I think you had made where Ionia	24		
25	6	made the determination that they did not want	25	DEL \	VECCHIO REPORTING
		Page 75			Page 77
1	7	Page 75 to do that or that it wasn't feasible to do	1	(2	Page 77 (203) 245-9583
1 2	7 8		1 2	(2	- I
		to do that or that it wasn't feasible to do		(2	203) 245-9583
2	8	to do that or that it wasn't feasible to do that. Could you explain the thinking there?	2	·	203) 245-9583 66
2	8 9	to do that or that it wasn't feasible to do that. Could you explain the thinking there? MS. TSOCHLAS: It's both not feasible and	2	1	203) 245-9583 66 company without the need for human
2 3 4	8 9 10	to do that or that it wasn't feasible to do that. Could you explain the thinking there? MS. TSOCHLAS: It's both not feasible and not beneficial to include the SWOMS, those two	2 3 4	1 2	203) 245-9583 66 company without the need for human intervention. However, due to the many
2 3 4 5	8 9 10 11	to do that or that it wasn't feasible to do that. Could you explain the thinking there? MS. TSOCHLAS: It's both not feasible and not beneficial to include the SWOMS, those two tanks and the SWOMS.	2 3 4 5	1 2	203) 245-9583 66 company without the need for human intervention. However, due to the many discussions we've carried out during previous
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 DEL	to do that or that it wasn't feasible to do that. Could you explain the thinking there? MS. TSOCHLAS: It's both not feasible and not beneficial to include the SWOMS, those two tanks and the SWOMS. MR. O'CONNELL: And why is that? MS. TSOCHLAS: First of all, the first tank you mentioned, the fuel drain tank, that is clean fuel that is reused, it's not bilge or waste, really. MR. O'CONNELL: That's the way the system is supposed to operate, correct? MS. TSOCHLAS: Yes. MR. O'CONNELL: And the other tank? MS. TSOCHLAS: The scavenger tank is a very, very small tank that doesn't have a sufficient amount in order to make it really practical to monitor. MR. O'CONNELL: Thank you. VECCHIO REPORTING 203) 245-9583	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	company without the need for human intervention. However, due to the many discussions we've carried out during previous hearings and our correspondence with Vigilant Marine, we managed to modify the systems so that hourly reporting could be carried out and modification was carried out in February and March of this year. So, the SWOMS are installed onboard all four vessels, we believe in full compliance with the requirements of the scope of work and are fully operational for all four vessels. So, shall we move on to the next item of the agenda? SPECIAL MASTER BUNDY: Yes. MS. TSOCHLAS: The fourth item of the agenda is the development of effective methodology and procedures to analyze and compare the shipboard records that are submitted by the vessel on a monthly basis with

		Page 78			Page 80
1	24	requires that the CCM is responsible for	1	16	are monthly sent from the vessel to shoreside
2	25	ensuring that electronic data is transmitted by	2	17	that are compared with the SWOMS's data?
3		V	3	18	THE WITNESS: There is it's included in
4		VECCHIO REPORTING	4	19	the procedure.
5	(2	203) 245-9583	5	20	SPECIAL MASTER BUNDY: Okay.
6		67	6	21	MS. TSOCHLAS: In the section that's for
7	1	the SWOMS and is submitted to the special	7	22	document submission. I don't know if we have
8	2	Master, the IEC, and the United States on a	8	23	it in this attachment, but we definitely have
9	3	monthly basis and is responsible for developing	9	24	it in the environmental management plan that's
10	4	procedures to review and analyze the shipboard	10	25	attached.
11	5	records and compare those records with the	11	5.51	VESSULO DEDORTINO
12	6	SWOMS's data.	12		VECCHIO REPORTING
13	7	So, now we have here a flowchart of the	13	((203) 245-9583
14	8	process that takes place in the company. The	14		69
15	9	CCM ensures that daily and hourly reports are	15	1	SPECIAL MASTER BUNDY: Do you know what
16	10	received at the company as required. All	16	2	section that would be?
17	11	hourly reports are maintained in our company's	17	3	MS. TSOCHLAS: It's in the U.S. compliance
18	12	electronic filing system on the company's	18	4	annex, which I think is in Section 13.
19	13	server, as we said earlier. The daily data	19	5	SPECIAL MASTER BUNDY: That's fine.
20	14	transmitted by the SWOMS is recorded in our	20	6	MS. TSOCHLAS: If we look in Section 13,
21	15	company's database, it's entered into a	21	7	it's in the it says daily tank soundings.
22	16	spreadsheet that facilitates the comparison of	22	8	Shall I find it for you a little bit
23	17	the records. Then the data submitted by the	23	9	later.
24	18	chief engineer on a monthly basis is also	24	10	SPECIAL MASTER BUNDY: That's fine. If we
25	19	entered into the spreadsheet. The CCM ensures	25	11	take a break, we can look for it. I don't want
		Page 79			Dogo 91
1	20	that a review of the data is carried out and	1	12	Page 81 to delay things unnecessarily.
2	21	ensures that there are no inconsistencies	2	13	MS. TSOCHLAS: So, shall we move onto the
3	22	between the daily and the monthly data, the	3	14	organization chart?
4	23	data that's transmitted by the SWOMS and the	4	15	SPECIAL MASTER BUNDY: Yes.
5	24	data that's submitted by the chief engineer,	5	16	MS. TSOCHLAS: Here I've circled in red
6	25	and in the event that any inconsistency is	6	17	the people that are the roles in the company
7			7	18	that are involved with the review of the
8	DEL	VECCHIO REPORTING	8	19	document submission.
9		203) 245-9583	9	20	We have a junior technical superintendent
10	`	, 68	10	21	who is responsible for ensuring that the data
11	1	identified, the hourly data transmitted by the	11	22	is received on a daily basis and on an hourly
12	2	SWOMS is utilized for further investigation in	12	23	basis and he is responsible for entering into
13	3	order to verify that there are no anomalies in	13	24	the spreadsheet the data as required. He works
14	4	the operations carried out onboard.	14	25	in liaison with the superintendent engineer in
15	5	So, if we open the attachment, we have	15		, ,
16	6	included the process for the comparison of	16	DEL	_ VECCHIO REPORTING
17	7	records in our environmental management plan.	17		(203) 245-9583
18	8	So, if we move down quite far, page three, I	18		70
19	9	have highlighted that process that I've just	19	1	the event that they find any discrepancies, and
20	10	explained in summary.	20	2	the technical manager is the CCM,
21	11	So, shall we go to the next slide?	21	3	Mr. Karagiorgis, is responsible for the
22	12	This is the company's organization chart.	22	4	overall is overall responsible for the
23	13	SPECIAL MASTER BUNDY: Before we go there,	23	5	process, he ensures that the process is carried
		in the area in the amount of I males and it in the	24	6	out as required and if any discrepancies or
24	14	is there in the maybe I missed it in the	24	U	out as required and it any discrepancies of
24 25	14 15	plan is there a list of the documents that	25	7	anomalies are identified, they are discussed

1		Page 82			Page 84
1	8	with him and he initiates the investigation as	1		72
2	9	required.	2	1	you're reviewing this data about how you would
3	10	SPECIAL MASTER BUNDY: How many people are	3	2	contact this vessel if there's discrepancy
4	11	employed at the level of superintendent	4	3	issues.
5	12	engineer?	5	4	MS. TSOCHLAS: It turns red.
6	13	MS. TSOCHLAS: We have three	6	5	MR. O'CONNELL: It turns red and is that
7	14	superintendent engineers.	7	6	based on what you view as the five percent
8	15	SPECIAL MASTER BUNDY: And there are	8	7	discrepancy?
9	16	junior technical engineers that are attached to	9	8	MS. TSOCHLAS: Yes, for the comparison
10	17	each?	10	9	between the SWOMS and the tank levels, the
11	18	MS. TSOCHLAS: We have one junior	11	10	manual tank levels.
12	19	technical independent and one special the	12	11	MR. O'CONNELL: So, in the sheet, if
13	20	junior technical superintendent is practically	13	12	there's a discrepancy over five percent, it
14	21	his entire responsibility is to do with this.	14	13	will come up red and that will trip some type
15	22	SPECIAL MASTER BUNDY: Okay.	15	14	of investigation on the shoreside part?
16	23	MS. TSOCHLAS: It takes up a lot of his	16	15	MS. TSOCHLAS: Exactly.
17	24	time.	17	16	So, shall we move to the next slide?
18	25	SPECIAL MASTER BUNDY: Okay. Thank you.	18	17	Upon completion of the review of the
19			19	18	documentation each month, we provide feedback
20		VECCHIO REPORTING	20	19	to the vessel's chief engineer, which may also
21	(2	203) 245-9583	21	20	include any requests for clarification.
22		71	22	21	Shall we move on to the fifth item of the
23	1	THE WITNESS: So, if we move to the next	23	22	agenda?
24	2	slide, we have the spreadsheet that's utilized	24	23	SPECIAL MASTER BUNDY: That's fine.
25	3	for the comparison of the data.	25	24	MS. TSOCHLAS: We're kind of speeding
		Page 83			Page 85
1	4	The data that is recorded in the	1	25	through this.
2	5	spreadsheet is the tank levels and volumes as	2		
3	6	per the SWOMS's data that's transmitted on the	3	DEL '	VECCHIO REPORTING
4		•			
4	7	24 hour basis. The tank levels and volumes as	4		03) 245-9583
5	8	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a			03) 245-9583 73
5	8 9	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the	4 5 6	(2 1	03) 245-9583 73 So, this item is how we have developed a
5 6 7	8 9 10	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and	4 5 6 7	(2 1 2	03) 245-9583 73 So, this item is how we have developed a system and procedures for the continual
5 6 7 8	8 9 10 11	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The	4 5 6 7 8	1 2 3	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental
5 6 7 8 9	8 9 10 11 12	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The spreadsheet automatically calculates the	4 5 6 7 8	(2 1 2 3 4	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental compliance and in fostering a culture of
5 6 7 8 9	8 9 10 11 12 13	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The spreadsheet automatically calculates the discrepancies, so it's very easy for the	4 5 6 7 8 9	1 2 3 4 5	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental compliance and in fostering a culture of compliance onboard our vessels and within our
5 6 7 8 9 10	8 9 10 11 12 13 14	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The spreadsheet automatically calculates the discrepancies, so it's very easy for the responsible person to identify whether any	4 5 6 7 8 9 10 11	1 2 3 4 5 6	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental compliance and in fostering a culture of compliance onboard our vessels and within our company ashore, it includes our management
5 6 7 8 9 10 11	8 9 10 11 12 13 14 15	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The spreadsheet automatically calculates the discrepancies, so it's very easy for the responsible person to identify whether any discrepancies are not within the tolerance.	4 5 6 7 8 9 10 11 12	1 2 3 4 5 6 7	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental compliance and in fostering a culture of compliance onboard our vessels and within our company ashore, it includes our management structure, the independence of the people that
5 6 7 8 9 10 11 12 13	8 9 10 11 12 13 14 15 16	24 hour basis. The tank levels and volumes as per manual soundings that are submitted on a monthly basis. The hours of operation of the oily water separator within each 24 hours, and the hours of operation of the incinerator. The spreadsheet automatically calculates the discrepancies, so it's very easy for the responsible person to identify whether any discrepancies are not within the tolerance. And if we open the attachment, you can see how	4 5 6 7 8 9 10 11 12 13	1 2 3 4 5 6 7 8	73 So, this item is how we have developed a system and procedures for the continual assessment in improving our environmental compliance and in fostering a culture of compliance onboard our vessels and within our company ashore, it includes our management structure, the independence of the people that are responsible with maintaining environmental
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		Page 86			Page 88
1	21	Captain Wigger and Mr. Sanborn who have been	1	13	This training has also been provided to our
2	22	following our progress throughout the four year	2	14	shore-based personnel, so I think probably the
3	23	period of boarding our vessels and having come	3	15	most important part of this program has been
4	24	to our offices at the beginning of the	4	16	the training. The SWOMS provides us with added
5	25	probation.	5	17	protection, but the most important thing in
6			6	18	environmental compliance is the culture of the
7	DEL	VECCHIO REPORTING	7	19	people in the office and onboard the vessel.
8	(2	203) 245-9583	8	20	So, training is key to changing the culture of
9		74	9	21	people, both onboard and in the company. So, I
10	1	So, shall we start	10	22	think it's been very important, our training
11	2	SPECIAL MASTER BUNDY: What do you	11	23	program in changing our culture.
12	3	attribute the change to?	12	24	MR. SANBORN: The second part of that
13	4	MS. TSOCHLAS: Well, there's been first	13	25	question was, does your perception of the
14	5	of all, we're on probation, so that really did	14		
15	6	encourage us to change, but apart from that,	15	DEL	_ VECCHIO REPORTING
16	7	there's been a change in the staff involved	16	((203) 245-9583
17	8	with the day-to-day operations at the offices,	17	`	76
18	9	that change can keep us now for example, me	18	1	enthusiasm for that in the training facilities
19	10	and Mr. Karagiorgis has brought about a huge	19	2	outside outside the company, i.e., the
20	11	change in the culture of the company and that's	20	3	Philippines where most of your people
21	12	not just to do with the environment, that's	21	4	ultimately come from?
22	13	actually to do with the overall running	22	5	MS. TSOCHLAS: Well, I think they have
			23	6	•
23	14 15	according to safety onboard our vessels. So,			become very aware of the company's
24	15	basically, what the company did was it took a	24	7	environmental policy and standard. I think
25	16	very negative experience and turned it into	25	8	that's not just within our company, but within
		D 07			D
1	17	Page 87	1	0	Page 89
1	17	something beneficial for the company because	1	9	all companies, a lot of the MARPOL violations
2	18	something beneficial for the company because we've turned over a new leaf.	2	10	all companies, a lot of the MARPOL violations that take place have a lot to do with lack of
2	18 19	something beneficial for the company because we've turned over a new leaf. SPECIAL MASTER BUNDY: Okay.	2	10 11	all companies, a lot of the MARPOL violations that take place have a lot to do with lack of awareness rather than actually wanting to do
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	18 19 20 21 22 23 24 25 DEL (2 3 4 5 6 7 8 9 10	something beneficial for the company because we've turned over a new leaf. SPECIAL MASTER BUNDY: Okay. Mr. Sanborn? MR. SANBORN: Miss Tsochlas, how big a role do you think the training has played in this, the external training, I'm thinking primarily of the Philippines and what changes have you seen in there, I'll call it, attitude VECCHIO REPORTING 203) 245-9583 75 toward the whole issue of environmental compliance? MS. TSOCHLAS: I think the training has played a huge role. We've totally changed our training program, it's become much more detailed, much more focused, and not just ashore and onboard, we've provided a huge amount of material. We have focused a lot of the environmental, but we've included a lot of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 DEI	all companies, a lot of the MARPOL violations that take place have a lot to do with lack of awareness rather than actually wanting to do something wrong intentionally, so training the training has really, really helped to increase the environmental awareness. Did I answer the question or are you asking something else? MR. SANBORN: Well, I guess my question was, the second piece to that question was, could you describe a change in attitude toward environmental training on behalf of the institutions? There are four of them that you deal with in the Philippines. MS. TSOCHLAS: Well, they have developed environmental training programs based on our request and I think on other companies's L VECCHIO REPORTING (203) 245-9583 77 request because it's not just our company

		Page 90			Page 92
1	5	shipping overall, so a number of the courses	1		-9
2	6	that are now being provided by the external	2	DEI	L VECCHIO REPORTING
3	7	organizations were not provided a few years	3	((203) 245-9583
4	8	ago, they weren't available a few years ago, so	4		79
5	9	they kind of become available based on popular	5	1	portrayed where the company was coming from,
6	10	demand.	6	2	too, as being really committed to the
7	11	MR. SANBORN: Thank you.	7	3	environmental aspect of compliance and
8	12	SPECIAL MASTER BUNDY: Captain Wigger?	8	4	everything else. So but those crew
9	13	MR. WIGGER: If you think it's appropriate	9	5	interviews themselves were, I think, a very
10	14	at this time, but in follow-up to some of Miss	10	6	good indication of where the company is right
11	15	Tsochlas's comments about training and culture,	11	7	now, because in other cases we have been
12	16	I could just give you some firsthand	12	8	involved in, I can tell you that you go to the
13	17	observations based on the last audit.	13	9	company, you do an office audit, you meet with
14	18	SPECIAL MASTER BUNDY: Well, then why	14	10	the management, everything is, oh, we got this
15	19	don't we do that since you've followed that	15	11	in place, we got this in place, and then you go
16	20	path.	16	12	onboard the vessel and a lot of what they say
17	21	MR. WIGGER: The last audit for me was an	17	13	they have in place from a training perspective,
18	22	excellent audit, but as part of that audit, I	18	14	even from an operational perspective is not
19	23	did interview a number of the crew members,	19	15	really there's not all that volume that you
20	24	both at the lower levels on up to the officer	20	16	would expect based upon the impression you get
21	25	ranks, and in those interviews they were fairly	21	17	from the management, but I can tell you that it
22		ranne, and in most months and most rainly	22	18	seems to be totally integrated, at least based
23	DFI	VECCHIO REPORTING	23	19	upon the final audit that I did carry out
24		203) 245-9583	24	20	onboard PLOUTOS, which was also the final of
25	(-	78	25	21	the finals. So, I just offer that up in
					and made 30, 1 Just 3.10. and up
1	1	Page 91	1	22	Page 93
1	1	lengthy, they were at random, there was no	1	22	relation to your comment?
2	2	preselection, there was no forewarning that I	3	23	MS. TSOCHLAS: Well, we have worked very
3	3	would be interviewing those individuals and the		24 25	hard on the training program. It's been very
4	4	individuals did focus a lot of the training,	4 5	25	important to us, because, as I said, putting a
5	5	awareness, and just their overall environmental	Э		
6	О	commitment and I think in my report I was able		DEI	L VECCULO DEPODITING
1 7	7	commitment, and I think in my report I was able			L VECCHIO REPORTING
7	7	to relay that the interviews were very, very	7		(203) 245-9583
8	8	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst	7 8	((203) 245-9583 80
8 9	8 9	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were	7 8 9	1	(203) 245-9583 80 machine on the vessel it does provide us with
8 9 10	8 9 10	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere,	7 8 9 10	1 2	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is
8 9 10 11	8 9 10 11	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working	7 8 9 10 11	1 2 3	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard
8 9 10 11 12	8 9 10 11 12	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete	7 8 9 10 11 12	1 2 3 4	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels.
8 9 10 11 12 13	8 9 10 11 12 13	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete environmental compliance, they spoke in detail	7 8 9 10 11 12 13	1 2 3 4 5	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels. MR. CHALOS: Do you think this is a good
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8 9 10 11 12 13 14 15	8 9 10 11 12 13 14 15	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete environmental compliance, they spoke in detail about the training they did receive, both the pre-joining and onboard training through the	7 8 9 10 11 12 13 14 15	1 2 3 4 5 6 7	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels. MR. CHALOS: Do you think this is a good time for a break? SPECIAL MASTER BUNDY: I guess this is not
8 9 10 11 12 13 14 15 16	8 9 10 11 12 13 14 15 16	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete environmental compliance, they spoke in detail about the training they did receive, both the pre-joining and onboard training through the safety environmental meetings, as well as the	7 8 9 10 11 12 13 14 15 16	1 2 3 4 5 6 7 8	(203) 245-9583 80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels. MR. CHALOS: Do you think this is a good time for a break? SPECIAL MASTER BUNDY: I guess this is not an endurance contest.
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8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete environmental compliance, they spoke in detail about the training they did receive, both the pre-joining and onboard training through the safety environmental meetings, as well as the computer based training, so that, to me, put a very good cap on things because, again, in the beginning of the process, training was an issue that we had, and the training program has developed over the time. Mr. Karagiorgis was also onboard during that last audit and, you know, his knowledge	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels. MR. CHALOS: Do you think this is a good time for a break? SPECIAL MASTER BUNDY: I guess this is not an endurance contest. (Whereupon, a brief recess was held.) SPECIAL MASTER BUNDY: Please continue, Miss Tsochlas. MS. TSOCHLAS: All right. So, we stopped off at the organization chart of the company. I'm going to try and speak even slower because
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	to relay that the interviews were very, very positive, there was a lot of enthusiasm amongst the crew members I did interview, there were it was it appeared to me to be very sincere, they were interested in the company, working with the company to ensure their complete environmental compliance, they spoke in detail about the training they did receive, both the pre-joining and onboard training through the safety environmental meetings, as well as the computer based training, so that, to me, put a very good cap on things because, again, in the beginning of the process, training was an issue that we had, and the training program has developed over the time. Mr. Karagiorgis was also onboard during	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14	80 machine on the vessel it does provide us with protection, but the most important thing is ensuring that we have the right culture onboard our vessels. MR. CHALOS: Do you think this is a good time for a break? SPECIAL MASTER BUNDY: I guess this is not an endurance contest. (Whereupon, a brief recess was held.) SPECIAL MASTER BUNDY: Please continue, Miss Tsochlas. MS. TSOCHLAS: All right. So, we stopped off at the organization chart of the company.

		David O.A.			D 0/
1	18	Page 94 circled in red, who is the CCM as well, and the	1	10	Page 96 environmental management representative have
2	19	DPA/EMR/QMR/CSO, that's me, the environmental	2	11	direct reporting lines to the managing
3	20	management representative.	3	12	director. We have no budget limitations with
4	21	As you can see, we both have direct	4	13	regards to the implementation of environmental
5	22	reporting lines to the managing director.	5	14	requirements in order to ensure environmental
6	23	Now, if we click on the attachments here,	6	15	compliance. This is of paramount importance to
7	24	we can see my responsibilities with regard to	7	16	our company and we aren't restricted in any way
8	25	our environmental compliance. I am to ensure	8	17	when it comes to budget as to what needs to be
9		γ	9	18	done to ensure environmental compliance.
10	DEL	. VECCHIO REPORTING	10	19	SPECIAL MASTER BUNDY: I guess that it's
11		203) 245-9583	11	20	no secret of the worldwide economic slowdown
12	`	81	12	21	and whether that's effected the company's
13	1	that the environmental management system	13	22	ability to comply with the environmental
14	2	requirements are established, implemented, and	14	23	requirements of the scope of work in general.
15	3	maintained in accordance with the requirements.	15	24	MS. TSOCHLAS: Obviously, it makes things
16	4	And to report on the performance of the	16	25	more difficult. The money isn't what it used
17	5	environmental management system to the managing	17		more amount the money lant mat it assu
18	6	director for review, and to base improvement of	18	DFI	VECCHIO REPORTING
19	7	the system. Ensure that audit results are	19		203) 245-9583
20	8	brought to the attention of the managing	20	`	83
21	9	director and that all personnel responsible,	21	1	to be, we can't hide that, but it's more
22	10	take the necessary corrective actions. I	22	2	expensive not to have proper environmental
23	11	maintain a list of environmental legislation	23	3	compliance. So, we've experienced no
24	12	applicable to our activities, and I maintain a	24	4	limitations when it comes to implementing
25	13	list of the environmental aspects of the	25	5	environmental requirements.
					4
		Page 95			Page 97
1	14	company's activities			
2		company's activities.	1	6	SPECIAL MASTER BUNDY: Thank you.
	15	So, now if we go to the CCM	2	7	MS. TSOCHLAS: Now, the environmental
3	16	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's	2	7 8	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier
3 4	16 17	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the	2 3 4	7 8 9	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based
3	16 17 18	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the implementation of the scope of work. He is	2 3 4 5	7 8 9 10	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based on the requirements of the scope of work and
3 4 5 6	16 17 18 19	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the implementation of the scope of work. He is responsible for coordinating with the special	2 3 4 5 6	7 8 9 10 11	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based on the requirements of the scope of work and the recommendations made by the IEC during the
3 4 5 6 7	16 17 18 19 20	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the implementation of the scope of work. He is responsible for coordinating with the special Master regarding the terms of probation,	2 3 4 5 6 7	7 8 9 10 11 12	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based on the requirements of the scope of work and the recommendations made by the IEC during the initial audit carried out onboard the M/T THEO
3 4 5 6 7 8	16 17 18 19 20 21	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the implementation of the scope of work. He is responsible for coordinating with the special Master regarding the terms of probation, ensuring that the terms of probation are	2 3 4 5 6 7 8	7 8 9 10 11 12 13	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based on the requirements of the scope of work and the recommendations made by the IEC during the initial audit carried out onboard the M/T THEO T in 2008.
3 4 5 6 7 8 9	16 17 18 19 20 21 22	So, now if we go to the CCM responsibilities. These are Mr. Karagiorgis's responsibilities in accordance with the implementation of the scope of work. He is responsible for coordinating with the special Master regarding the terms of probation, ensuring that the terms of probation are implemented and ensuring compliance, ensuring	2 3 4 5 6 7 8 9	7 8 9 10 11 12 13	MS. TSOCHLAS: Now, the environmental management plan. As I've already said earlier on in the presentation, it was developed based on the requirements of the scope of work and the recommendations made by the IEC during the initial audit carried out onboard the M/T THEO T in 2008. The finalized environmental management
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		D			D 100
1	2	Page 98 vessels made by Mr. Sanborn following his	1	23	Page 100 there was one procedure for all elements of
2	3	review of the environmental management plan,	2	24	that safety management system. Based on
3	4	following our own, based on our own	3	25	Captain Wigger's recommendation, we separated
4	5	observations during the implementation of the	4	20	ouptain Miggor's recommendation, we separated
5	6	plan, and suggestions made by our crew members	5	DFI	VECCHIO REPORTING
6	7	when they carryout reviews of the system.	6		203) 245-9583
7	8	Now I've attached to the environmental	7	(-	86
8	9	management plan I don't think we'll go	8	1	the environmental management plan so we could
9	10	through it all	9	2	provide more focus on the implementation of
10	11	SPECIAL MASTER BUNDY: All 137 pages, I	10	3	those requirements and enhance the
11	12	don't think it's necessary.	11	4	implementation of the requirements and, also,
12	13	MS. TSOCHLAS: Believe me, it took a lot	12	5	assist our crew members in gaining a better
13	14	of work to develop those 137 pages.	13	6	grasp of the requirements of the environmental
14	15	SPECIAL MASTER BUNDY: I'm sure it did.	14	7	management plan, and there we included a number
15	16	Did you use any particular source to help	15	8	of procedures that were entirely focused on the
16	17	with you the ISO 14,001?	16	9	environmental compliance aspect of the system.
17	18	MS. TSOCHLAS: We've used ISO 14,001	17	10	MR. O'CONNELL: So, there's been a big
18	19	prototype, but our main source was Captain	18	11	change since, you know, 2008 when probation
19	20	Wigger's experience and input.	19	12	started?
20	21	SPECIAL MASTER BUNDY: Okay.	20	13	MS. TSOCHLAS: A huge change, not a big
21	22	MR. O'CONNELL: I have a question.	21	14	change, a huge change. We have 137 extra
22	23	Regarding previously, the company is	22	15	pages.
23	24	supposed to have an environmental compliance	23	16	SPECIAL MASTER BUNDY: Mr. Sanborn?
24	25	plan as part of their ISM compliance, and so	24	17	MR. SANBORN: Miss Tsochlas, in terms of
25			25	18	feedback from the users of this manual, what
1	DEI	Page 99	1	10	Page 101
1		VECCHIO REPORTING	1	19	have you gleaned from those that are using it,
2		VECCHIO REPORTING 203) 245-9583	2	20	have you gleaned from those that are using it, are they were they overwhelmed with it in
2 3	(2	VECCHIO REPORTING 203) 245-9583 85	2	20 21	have you gleaned from those that are using it, are they were they overwhelmed with it in the beginning, have they warmed up to it, has
2 3 4	1	VECCHIO REPORTING 203) 245-9583 85 this is something that's been so, there	2 3 4	20 21 22	have you gleaned from those that are using it, are they were they overwhelmed with it in the beginning, have they warmed up to it, has it can you say it is or, to some degree, a
2 3 4 5	1 2	VECCHIO REPORTING 203) 245-9583 85 this is something that's been so, there should have been or there was an environmental	2 3 4 5	20 21 22 23	have you gleaned from those that are using it, are they were they overwhelmed with it in the beginning, have they warmed up to it, has it can you say it is or, to some degree, a useful tool to the manual?
2 3 4 5 6	1 2 3	VECCHIO REPORTING 203) 245-9583 85 this is something that's been so, there should have been or there was an environmental compliance plan prior to 2008 or 2009 when this	2 3 4 5 6	20 21 22 23 24	have you gleaned from those that are using it, are they were they overwhelmed with it in the beginning, have they warmed up to it, has it can you say it is or, to some degree, a useful tool to the manual? MS. TSOCHLAS: Well, initially, of course,
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		Page 102		_	Page 104
1	15	due to lack of awareness and lack of awareness	1	7	at TMSA, a track from the oil majors that where
2	16	of the consequences and lack of guidance from	2	8	you do have these vetting, do they look at this
3	17	the company, so they appreciate that they have	3	9	as a positive thing or do they, again, look at
4	18	clear guidelines as to what they're supposed to	4	10	it, wait a minute, what's this probation as far
5	19	do when it comes to the environmental	5	11	as vetting your vessels?
6	20	management system.	6	12	MS. TSOCHLAS: I just had a conversation
7	21	MR. SANBORN: Thank you.	7	13	earlier with Captain Burgess. They don't look
8	22	MR. WIGGER: A question also.	8	14	at the probation as a positive thing. I think
9	23	Are you integrating into this management	9	15	that goes without saying.
10	24	system the tanker management assessment?	10	16	MR. WIGGER: But relative to what you're
11	25	MS. TSOCHLAS: Of course.	11	17	implementing as a result of that probation, do
12			12	18	they perceive that as positive?
13	DEL \	VECCHIO REPORTING	13	19	MS. TSOCHLAS: Yeah, they find our system
14	(2	03) 245-9583	14	20	is very positive. They find that we have a
15		88	15	21	very high level of compliance with the
16	1	MR. WIGGER: So, how far along in the	16	22	environment. They have expressed that they
17	2	process are you with that as far as developing	17	23	find that we've dealt with the whole issue very
18	3	your	18	24	well with implementing environmental standards.
19	4	MS. TSOCHLAS: Within the last year, we've	19	25	Generally, it's come out as very positive when
20	5	had three TMSA orders, one by Sharon, one by	20		
21	6	OMV, which is an Australian major, and the last	21	DEL	VECCHIO REPORTING
22	7	one was by Exxon Mobil, and we did very well in	22	(2	203) 245-9583
23	8	all three of them.	23		90
24	9	MR. WIGGER: And your environmental	24	1	it comes to addressing our issues with the
25	10	section of the TMSA is that it's been	25	2	environment, and they've seen that we've
		Page 103			Page 105
1	11	Page 103 integrated or	1	3	Page 105 changed overall and they can see that we have
1 2	11 12		1 2	3 4	
		integrated or			changed overall and they can see that we have
2	12	integrated or MS. TSOCHLAS: Yes, that's been integrated	2	4	changed overall and they can see that we have focused on the environment, because that is
2	12 13	integrated or MS. TSOCHLAS: Yes, that's been integrated and that's audited during those audits. We're	2	4 5	changed overall and they can see that we have focused on the environment, because that is where our problem was, but the changes that
2 3 4	12 13 14	integrated or MS. TSOCHLAS: Yes, that's been integrated and that's audited during those audits. We're at level four because TMSA is level one, two,	2 3 4	4 5 6	changed overall and they can see that we have focused on the environment, because that is where our problem was, but the changes that came about to our culture with environmental
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1	(*	Page 106	1	20	Page 108
1	(.	203) 245-9583	-		S S
2	1	91	2	21	beginning, regardless of what their knowledge
3	1	on the environment, but as I said earlier, it's	3	22	and competency might be, we want to do it from
4	2	affected all the elements of our management	4	23	the beginning to ensure that it's in line on
5	3	system positively.	5	24	our standards and our requirements.
6	4	Now, the training program provides us with	6	25	Now, the competency results are reviewed
7	5	four parts. We have competency evaluation	7	DE	L VECCUIO DEDODTINO
8	6	prior to joining, pre-joining familiarization	8		L VECCHIO REPORTING
9	7	and training while the seafarers are ashore,	9		(203) 245-9583
10	8	onboard training, and then superintendent	10		93
11	9	onboard training.	11	1	and assessed and if we identify any areas of
12	10	Here I've focused on the shipboard	12	2	weakness, we provide additional training that's
13	11	personnel training. We've also had a lot of	13	3	focused on those areas.
14	12	training going on with shore-based personnel,	14	4	SPECIAL MASTER BUNDY: Do I understand
15	13	which I didn't really include in this	15	5	from what you said before that the competency
16	14	presentation, I focused more on the shipboard	16	6	evaluation does not include the environmental
17	15	personnel and training.	17	7	issues?
18	16	Now, competency evaluation that's carried	18	8	MS. TSOCHLAS: It's not focused on the
19	17	out prior to joining is focused on assessing	19	9	environmental issues, it's focused on the
20	18	seafarers's competence overall with respect to	20	10	competency and the training of seafarers with
21	19	their responsibilities, and as you can see, we	21	11	regard to their qualifications, their
22	20	have it's divided according to rank and	22	12	certificates, because we don't want to do
23	21	department. So, our senior deck officers are	23	13	retraining overall, of course, so we just focus
24	22	assessed in their knowledge and competency	24	14	on the areas of weakness, but the environmental
25	23	regarding cargo handling, control operation,	25	15	training is from scratch with everybody and
		David 107			Page 100
1	24	Page 107 firefighting, GMDS, navigation, and survival.	1	16	Page 109 even with rejoining seafarers, they go through
2	25	SPECIAL MASTER BUNDY: What's GMDS?	2	17	the whole process every time so we can make
3	23	SI ECIAL WASTER DONDT. What's GIVIDS:	3	18	
4	DEL	VECCHIO REPORTING	4	19	
5		203) 245-9583	5	20	
6	(2	92	6	21	SPECIAL MASTER BUNDY: Okay.
7	1	MS. TSOCHLAS: It's the radio system.	7	22	MS. TSOCHLAS: Now, pre-joining
8	2	Our junior deck officers are assessed	8	23	, , ,
9	3	with, again, cargo handling, control operation,	9	24	extensive program, it takes usually about 10
10	4	firefighting, navigation, survival. Our	10	25	days and it's a combination of in-house
11	5	ratings are also assessed.	11	23	days and it's a combination of in-nouse
12	6	With regard to cargo handling, emergency	12	DE	L VECCHIO REPORTING
13	7	equipment and procedures, the English language,	13		(203) 245-9583
14	8	safe watch, and steering. While our engine	14		94
15	9	officers are assessed with regards to control	15	1	training and familiarization and external
	10	operation, electrical and electronics,	16		training and raminarization and external training and organizations ashore.
16 17	11	firefighting, maintenance and repair, marine	17	2	If we click on the attachment for
18	12	engineering and survival. And engine ratings	18	3 4	pre-joining familiarization program, you can
19	13	with regard to boiler watch, emergency	19	5	see this is to do with the safety management
20	13 14	equipment and procedures, English language, and	20	5 6	system and the environmental management plan,
21	15	safe watch. So, all this assessment is to	21	7	so you can see we begin with our code of
4		ensure that our vessels are to be run safely,	22	8	ethics I'll just mention the parts that have
າາ	16	chaute that our vessels are to be full safety,			culies The just intention the parts that have
22	16 17	which is important to protecting the	22	()	to do with the environment
23	17	which is important to protecting the	23	9 10	to do with the environment. On the second day we have our safety and
		which is important to protecting the environment as well. When it comes to environmental assessment,	23 24 25	9 10 11	

	Dava 11			Dama 112
1	Page 11 Then on the next page, we have ISO 14,001,	1	4	Page 112 this initial training, are the applicants
2	our environmental management plan, and MARPOL		5	actually tested in these?
3	14 So, it is a familiarization with our	3	6	MS. TSOCHLAS: Their testing is carried
4	15 safety management system and our environmental	4	7	out using the C.B.T. titles. They're
5	16 management plan.	5	8	monitored, though, throughout the pre-joining
6	17 During that time, we the next		9	familiarization by the trainers, whether
7	18 attachment shows the pre-joining	6	10	_
8	19 familiarization and it's in more detail what	8		they're in Greece or the Philippines, and at
9		9	11 12	the end, there's an appraisal carried out of
	, , , , , , , , , , , , , , , , , , , ,	1		their performance during the training, and we
10 11	part two, on the first page, and then on the next page we have oil record book, part one,	10	13	also get feedback from training the external
	. 3	11	14 15	training organizations.
12	garbage handling, again, by the safety and	12	15	MR. CHALOS: Miss Tsochlas, when you say
13	quality control department, environmental	13	16	C.B.T., you're talking about computer based
14	aspects, impacts, and programs, environmental	14	17	training?
15	DEL VECCUIO DEDODTINO	15	18	MS. TSOCHLAS: Yes.
16	DEL VECCHIO REPORTING	16	19	MR. CHALOS: You do computer based
17	(203) 245-9583	17	20	training at the initial phase as well?
18	95	18	21	MS. TSOCHLAS: We do.
19	legislation, the VGP, the environmental	19	22	MR. O'CONNELL: I have a question
20	2 management plan, the STS plan, and MARPOL	20	23	regarding the familiarization, is that a one
21	3 issues.	21	24	time training? For example, if a seaman's on
22	4 SPECIAL MASTER BUNDY: On these it shows a	22	25	the PLOUTOS, for example, he gets the training
23	5 check what is that?	23	551	VEGGUIO BEDORTINO
24	6 MS. TSOCHLAS: As we go through all of	24		VECCHIO REPORTING
25	7 these issues, we check we check that we've	25	(,	203) 245-9583
	Page 11			Page 113
1	O dans them. This shouldist is semantated for			
	8 done them. This checklist is completed for	1		97
2	9 each seafarer that goes through the pre-joining	1 2	1	97 before and then he signs off six months later
3	·		1 2	before and then he signs off six months later and then signs back on, you know, to the
	9 each seafarer that goes through the pre-joining	2		before and then he signs off six months later
3	 9 each seafarer that goes through the pre-joining 10 familiarization program. 	2 3	2	before and then he signs off six months later and then signs back on, you know, to the
3 4	 each seafarer that goes through the pre-joining familiarization program. SPECIAL MASTER BUNDY: So, as the seafarer 	2 3 4	2	before and then he signs off six months later and then signs back on, you know, to the PLOUTOS or another Ionia vessel, you know, four
3 4	 each seafarer that goes through the pre-joining familiarization program. SPECIAL MASTER BUNDY: So, as the seafarer takes the class and completes a particular 	2 3 4	2 3 4	before and then he signs off six months later and then signs back on, you know, to the PLOUTOS or another Ionia vessel, you know, four months later, does he get the training again?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	9 each seafarer that goes through the pre-joining 10 familiarization program. 11 SPECIAL MASTER BUNDY: So, as the seafarer 12 takes the class and completes a particular 13 course, then that's checked off? 14 MS. TSOCHLAS: Exactly. And he might also 15 do additional C.B.T. training, that's listed in 16 this form. 17 The first two pages are for the officers. 18 And then we have the next checklist is for the 19 ratings. The ratings we deal with them in a 20 slightly different way because their level of 21 knowledge is more basic. In here I've 22 highlighted the issues that I've discussed, the 23 environmental policy, our safety environmental 24 policy, the environmental responsibilities of 25 the individuals, ISO 14,001. And I think DEL VECCHIO REPORTING (203) 245-9583	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	before and then he signs off six months later and then signs back on, you know, to the PLOUTOS or another Ionia vessel, you know, four months later, does he get the training again? MS. TSOCHLAS: He goes through the whole process again. We focus on the training prior to joining extensively because it's very important and we want to make sure that any gaps that things we might have missed in the first time around, we'll get them the second time around or the third time around, and there's also with the new regulations coming in all the time, we're making amendments to our plan all the time, so it's important to ensure that our seafarers are up to date with all these issues. MR. O'CONNELL: So, the pre-joining is vessel specific, it's not company wide, so you just don't do it once? MS. TSOCHLAS: No, every seafarer goes
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	9 each seafarer that goes through the pre-joining 10 familiarization program. 11 SPECIAL MASTER BUNDY: So, as the seafarer 12 takes the class and completes a particular 13 course, then that's checked off? 14 MS. TSOCHLAS: Exactly. And he might also 15 do additional C.B.T. training, that's listed in 16 this form. 17 The first two pages are for the officers. 18 And then we have the next checklist is for the 19 ratings. The ratings we deal with them in a 20 slightly different way because their level of 21 knowledge is more basic. In here I've 22 highlighted the issues that I've discussed, the 23 environmental policy, our safety environmental 24 policy, the environmental responsibilities of 25 the individuals, ISO 14,001. And I think DEL VECCHIO REPORTING (203) 245-9583 96 1 that's it on the code of ethics which hasn't	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	before and then he signs off six months later and then signs back on, you know, to the PLOUTOS or another Ionia vessel, you know, four months later, does he get the training again? MS. TSOCHLAS: He goes through the whole process again. We focus on the training prior to joining extensively because it's very important and we want to make sure that any gaps that things we might have missed in the first time around, we'll get them the second time around or the third time around, and there's also with the new regulations coming in all the time, we're making amendments to our plan all the time, so it's important to ensure that our seafarers are up to date with all these issues. MR. O'CONNELL: So, the pre-joining is vessel specific, it's not company wide, so you just don't do it once? MS. TSOCHLAS: No, every seafarer goes through pre-joining familiarization and training, regardless of whether it's the first

		D 444			D 444
1	25	Page 114 through the same program.	1	17	Page 116 our seafarers will do some C.B.T. training, and
2		through the same program.	2	18	that's also recorded in the checklist that I
3	DFI	VECCHIO REPORTING	3	19	showed you earlier, and there we can evaluate
4		203) 245-9583	4	20	their performance in that training because
5	(-	98	5	21	C.B.T each section on C.B.T. is completed
6	1	SPECIAL MASTER BUNDY: And regardless of	6	22	with a test.
7	2	whether he's signing on to the same ship?	7	23	SPECIAL MASTER BUNDY: During the
8	3	MS. TSOCHLAS: Regardless of whether he's	8	24	pre-joining familiarization, are the seafarers
9	4	signing on to the same ship. It makes no	9	25	evaluated for their competency and do seafarers
10	5	difference where he's going or how many times	10		' '
11	6	he's come back.	11	DEL	VECCHIO REPORTING
12	7	SPECIAL MASTER BUNDY: Okay.	12	(2	203) 245-9583
13	8	MS. TSOCHLAS: And they're happy with that	13		100
14	9	because they get paid for that period.	14	1	washout in this process from time to time?
15	10	SPECIAL MASTER BUNDY: Please continue.	15	2	MS. TSOCHLAS: Well, with the initial
16	11	MS. TSOCHLAS: All right. So, if we go to	16	3	competency evaluation, if they get below
17	12	the next slide. We also have in-house	17	4	50 percent, we analyze their results, see where
18	13	seminars, that is also a new process that we	18	5	they went wrong, see where they need additional
19	14	have in place that we didn't have originally,	19	6	training, and we provide that additional
20	15	where we have a shipboard environmental	20	7	training, and then they're re-evaluated.
21	16	management system seminar, that was the seminar	21	8	Throughout the period of the pre-joining
22	17	that was developed by us in liaison with the	22	9	evaluation, they're monitored for their
23	18	training organizations, they provided us with	23	10	performance and there have been occasions where
24	19	advice and material so that we could develop	24	11	we've decided we can't send the specific
25	20	kind of a customized training for our needs	25	12	seafarer onboard.
		Page 115			Page 117
1	21	with regards to the environment.	1	13	SPECIAL MASTER BUNDY: And I'm
2	22	We have an environmental officer training	2	14	particularly interested in, I believe, a year
3	23	course.	3	15	and a half ago or so we had the position of the
4	24	Volatile organic compound training	4	16	chief engineer who was unaware of his
5	25	seminar, which has to do with the regulation	5	17	responsibilities and certain recordkeeping
6			6	18	matters, have you taken any steps to ensure
7		VECCHIO REPORTING	7	19	that somebody can't get through your
8	((203) 245-9583	8	20	pre-joining familiarization with a state of
9		99	9	21	knowledge like that?
10	1	that came into effect in 2010, last year, and	10	22	MS. TSOCHLAS: We've become we're
	_				
11	2	our environmental management plan.	11	23	trying to be more and more careful all the time
12	3	our environmental management plan. If we click on the attachment, we have the	12	24	trying to be more and more careful all the time with that, but, you know, when you're working
12 13	3 4	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The	12 13		trying to be more and more careful all the time
12 13 14	3 4 5	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not	12 13 14	24 25	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be
12 13 14 15	3 4 5 6	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment.	12 13 14 15	24 25 DEL	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING
12 13 14 15 16	3 4 5 6 7	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one.	12 13 14 15 16	24 25 DEL	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583
12 13 14 15 16 17	3 4 5 6 7 8	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's	12 13 14 15 16 17	24 25 DEL (trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101
12 13 14 15 16 17 18	3 4 5 6 7 8 9	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary.	12 13 14 15 16 17 18	24 25 DEL (trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines,
12 13 14 15 16 17 18 19	3 4 5 6 7 8 9 10	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary. MS. TSOCHLAS: And then we have computer	12 13 14 15 16 17 18 19	24 25 DEL (1 2	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines, and that was a one it's the only incident
12 13 14 15 16 17 18 19 20	3 4 5 6 7 8 9 10 11	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary. MS. TSOCHLAS: And then we have computer based training units that are installed at both	12 13 14 15 16 17 18 19 20	24 25 DEL (1 2 3	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines, and that was a one it's the only incident we've had. We have six vessels, which means 25
12 13 14 15 16 17 18 19 20 21	3 4 5 6 7 8 9 10 11	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary. MS. TSOCHLAS: And then we have computer based training units that are installed at both the manning agent in Manila and in our office	12 13 14 15 16 17 18 19 20 21	24 25 DEL (1 2 3 4	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines, and that was a one it's the only incident we've had. We have six vessels, which means 25 people onboard twice a year on those six
12 13 14 15 16 17 18 19 20 21 22	3 4 5 6 7 8 9 10 11 12 13	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary. MS. TSOCHLAS: And then we have computer based training units that are installed at both the manning agent in Manila and in our office in Greece. They cover a wide range of titles.	12 13 14 15 16 17 18 19 20 21 22	24 25 DEL (1 2 3 4 5	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines, and that was a one it's the only incident we've had. We have six vessels, which means 25 people onboard twice a year on those six vessels and it's the only incident that we've
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12 13 14 15 16 17 18 19 20 21 22	3 4 5 6 7 8 9 10 11 12 13	our environmental management plan. If we click on the attachment, we have the syllabus of those training classes. The syllabus also includes some things that are not terribly related to the environment. I won't go through this one by one. SPECIAL MASTER BUNDY: I don't think it's necessary. MS. TSOCHLAS: And then we have computer based training units that are installed at both the manning agent in Manila and in our office in Greece. They cover a wide range of titles.	12 13 14 15 16 17 18 19 20 21 22	24 25 DEL (1 2 3 4 5	trying to be more and more careful all the time with that, but, you know, when you're working with people, there's always going to be VECCHIO REPORTING 203) 245-9583 101 because they're people, they're not machines, and that was a one it's the only incident we've had. We have six vessels, which means 25 people onboard twice a year on those six vessels and it's the only incident that we've

		Page 118			Page 120
1	9	think Captain Wigger saw, especially with the	1	1	changed here is that we have at least one week
2	10	chief engineer on the PLOUTOS, she's a very	2	2	of each month is focused on environmental
3	11	good chief engineer.	3	3	training. We've provided additional resources
4	12	MR. WIGGER: True. Again, the crew	4	4	to enhance that onboard training is carried
5	13	onboard that vessel was very impressive, and,	5	5	out, such as the use of the C.B.T., video,
6	14	again, impressive in the sense of knowledge,	6	6	DVDs, and training material.
7	15	their recordkeeping, their commitment, and	7	7	Shall we open the attachment?
8	16	everything else.	8	8	And you'll see in each month the second
9	17	SPECIAL MASTER BUNDY: Okay.	9	9	week, usually, at least the second week is
10	18	MS. TSOCHLAS: So, shall we go to the next	10	10	focused on pollution prevention. And we have a
11	19	slide?	11	11	variety of issues that I've discussed.
12	20	SPECIAL MASTER BUNDY: Yes.	12	12	Now, the completion of training of each
13	21	MS. TSOCHLAS: Training is carried out at	13	13	month, a record of that training is submitted
14	22	external organizations. In MARPOL Annex I, II,	14	14	to our company for review. So, we make sure on
15	23	III, IV, V, and VI, in hazmat, which is the	15	15	a monthly basis that the training is carried
16	24	dangerous hazardous and harmful cargoes,	16	16	out in compliance with the program and we
17	25	environmental management system, and oil record	17	17	review the material that's being used by the
18			18	18	trainer, which is the chief officer, to carry
19	DEL '	VECCHIO REPORTING	19	19	out that training.
20		203) 245-9583	20	20	Now, if we go to the next item, the
21	•	102	21	21	shipboard drills. Drills are carried out on a
22	1	book part one recordkeeping.	22	22	monthly basis, a variety of drills in
23	2	The attachment has a syllabus from all the	23	23	accordance with our drill program. We issue
24	3	organizations that are used to provide this	24	24	that drill program on a yearly basis, it's
25	4	training. Again, I don't think I'll go through	25	25	reviewed and improved and enhanced every year
1	5	Page 119	1		Page 121
1	5	that.	1	DFI	_
2	6	that. SPECIAL MASTER BUNDY: No.	2		VECCHIO REPORTING
2	6 7	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are	2		VECCHIO REPORTING 203) 245-9583
2 3 4	6 7 8	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are	2 3 4	(2	VECCHIO REPORTING 203) 245-9583 104
2	6 7 8 9	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone	2 3 4 5	(2 1	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month
2 3 4 5 6	6 7 8 9 10	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone MS. TSOCHLAS: They are all certified,	2 3 4 5 6	1 2	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month we have a pollution prevention drill.
2 3 4 5 6 7	6 7 8 9 10 11	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone MS. TSOCHLAS: They are all certified, it's part of our quality system to ensure that	2 3 4 5 6 7	1 2 3	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month we have a pollution prevention drill. If you go to the bottom of this page, you
2 3 4 5 6 7 8	6 7 8 9 10 11 12	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone MS. TSOCHLAS: They are all certified, it's part of our quality system to ensure that they are certified. And they're very well	2 3 4 5 6 7 8	1 2 3 4	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month we have a pollution prevention drill. If you go to the bottom of this page, you can see the oil spills and drills.
2 3 4 5 6 7 8	6 7 8 9 10 11 12 13	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone MS. TSOCHLAS: They are all certified, it's part of our quality system to ensure that they are certified. And they're very well known. Far East, I think all Philippines	2 3 4 5 6 7 8 9	1 2 3 4 5	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month we have a pollution prevention drill. If you go to the bottom of this page, you can see the oil spills and drills. The same thing happens here on the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 DEL	that. SPECIAL MASTER BUNDY: No. I just have one question about that. Are the training organizations that you use, are they certified by anyone MS. TSOCHLAS: They are all certified, it's part of our quality system to ensure that they are certified. And they're very well known. Far East, I think all Philippines are certified from Far East. Marine as well, and Marine Training and Safety Consultants is a Greek company, it's very well-known in Greece. We use reputable companies. So, then we'll go onto the next element of our training program, which is onboard training. Originally, we did have onboard training being carried out, where weekly training sessions were required to be carried out. We have continued that program. We issue a training program every six months. What has	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	VECCHIO REPORTING 203) 245-9583 104 in accordance with requirements. Every month we have a pollution prevention drill. If you go to the bottom of this page, you can see the oil spills and drills. The same thing happens here on the conclusion of each drill, a report is prepared and is provided to the company, we review it to make sure that drills are carried out in accordance with the drill program and we make sure they provide us photographic evidence of those drills, so that we can be 100 percent sure that we've done them, and we review the content of that drill to ensure that it's adequate. The next item is we have provided computer based training units onboard all our vessels. Each seafarer is required to carry out one C.B.T. title, at least, per month. If they want to do more, they can do more. This

		Page 122			Page 124
1	22	passwords. I don't think we need to go through	1	14	superintendent must board the vessel and once a
2	23	the details of this procedure.	2	15	year a marine superintendent must board the
3	24	Now, if we look at the next attachment, a	3	16	vessel. In practice, the technical department
4	25	matrix. This is recommended. We have allowed	4	17	will visit the vessel twice a year and the
5			5	18	operating superintendents will visit each
6		VECCHIO REPORTING	6	19	vessel twice a year. So, approximately, four
7	(2	203) 245-9583	7	20	times a year.
8		105	8	21	SPECIAL MASTER BUNDY: The superintendent
9	1	a certain degree of freedom to our seafarers to	9	22	onboard training is that done every time a
10	2	choose what interests them most, because we	10	23	superintendent boards a vessel or once per
11	3	want them to enjoy the training, we want them	11	24	year?
12	4	to actually do it.	12	25	MS. TSOCHLAS: Training is usually carried
13	5	If you look at the next page, we have the	13		
14	6	environmental title. We have engine room waste	14		. VECCHIO REPORTING
15	7	management. Sewage and water, waste water	15	(203) 245-9583
16	8	treatment. MARPOL Annex VI, pollution section,	16		107
17	9	waste and garbage management, preventing	17	1	out once per year, but when they board for this
18	10	pollution at sea. So, we have a number of	18	2	procedure, it's solely focused on training,
19	11	titles to do with the environment, amongst	19	3	they don't do anything else, and that's once
20	12	other titles, and every year we add more	20	4	per year.
21	13	titles.	21	5	SPECIAL MASTER BUNDY: And is that in
22	14	So, if we go to the next slide, this was	22	6	addition to their other boarding?
23	15	the last phase of our restructuring of our	23	7	MS. TSOCHLAS: Yes. And it's usually
24	16	training program, it's our superintendent	24	8	marine superintendents who do this. The
25	17	onboard training program. Our superintendent	25	9	technical superintendents have also done it,
1	18	Page 123 will ride with the vessel once per year to	1	10	Page 125 they're also involved with the procedure, but
2	19	implement specifically for training purposes	2	11	when it's focused entirely on training, it's
3	20	and they implement an onboard training program	3	12	usually the marine superintendents.
4	21	that's been prepared by my department, it's	4	13	If we go to the next slide, we can click
5	22	prepared based on the vessel's performance,	5	14	on the attachment. In here we have a procedure
6	23	previous audit and inspection results, last	6	15	and the next third and fourth page show the
7	24	attendance report, any accident, incident, or	7	16	report that's produced, that's completed,
8	25	injuries or near miss reports, either on a	8	17	following the onboard training attendance. And
9	25	injuries of fieur miss reports, ettrici on a	9	18	this is one of the procedures that very few
10	DFI	VECCHIO REPORTING	10	19	other shipping companies have.
11		203) 245-9583	11	20	MR. SANBORN: May I ask a question?
12	(2	106	12	21	SPECIAL MASTER BUNDY: Mr. Sanborn.
13	1	specific vessel or any other vessel in the	13	22	MR. SANBORN: Miss Tsochlas, I noted in
14	2	fleet. Management and Master's reviews,	14	23	the material on the computer based training you
15	3	previous shipboard training reports, and	15	24	also have a system to capture the results that,
16	4	appraisal reports. This is an overall training	16	25	I guess, the chief officer slash training
17	5	program, it includes elements of the	17		garar, and amount states training
18	6	environment, but it also includes safety as	18	DFI	_ VECCHIO REPORTING
19	7	well.	19		(203) 245-9583
20	8	SPECIAL MASTER BUNDY: How often do the	20	`	108
21	9	superintendents actually board the vessel and	21	1	officer submits data based on what he's
22	10	ride them?	22	2	extracted from the sessions that individual
	11	MS. TSOCHLAS: At least twice per year.	23	3	crew members have made and that goes into
23	11				_
23 24	12	It's usually more than that. Our procedures	24	4	Videotel's big machine in the sky, or what have
		It's usually more than that. Our procedures require at least one per year the technical	24 25	4 5	Videotel's big machine in the sky, or what have you, that tracks all of the training. Does

that that gives you a record over time, as 1 7 ounderstand it, of what courses they've taken, as 1 8 how they've done, and so forth. Does the same 4 9 type of information get entered into that 5 10 system from your supervisor's training? 11 MS. TSOCHLAS: The software that Videotel 6 13 by Video Tell to facilitate the C.B.T., but 6 14 they've expanded that and it's actually a very, 9 15 they user friendly and it's been very useful to 9 16 us, it's web based, and it allows us to record 1 17 to record the videos they've watched, the DVDs 1 18 to record the videos they've watched, the DVDs 1 19 they're carried, and the onboard drills they've 1 10 to record the videos they've watched, the DVDs 1 10 to reached and it allows us to record 1 10 20 carried out, and it allows us to neiter our 1 16 21 superintendent training records into that 1 16 21 superintendent training records into that 1 16 21 superintendent training records into that 1 17 22 database and it also allows us to make a 1 18 23 schedule. Often when a superintendent goes 1 19 24 mobard for attendance, hell see some areas of 1 20 25 weakness and he'll leave a schedule for the 2 21 weeks and he'll leave a schedule for the 2 22 database and it also lives us to make a 1 23 (203) 245-9583 1 24 month on day one you'll do calibration of gas 2 24 month on day one you'll do calibration of gas 2 25 monitoring equipment, and on day two you'll 2 26 training officer, and reminds him each day that 5 27 month on day one you'll do calibration of gas 2 28 monitoring equipment, and on day two you'll 2 29 month on day one you'll do calibration of gas 3 20 the training officer, and reminds him each day that 5 21 month on day one you'll do calibration of gas 2 22 month on day cone you'll do calibration of gas 3 23 the training officer, and reminds him each day that 5 24 month on day one you'll do calibration of gas 3 25 the training officer, and reminds him each day that 5 26 training officer, and reminds him each day that 5 27 month on day one you'll do calibration of gas			D 12/			D 100
2 7 understand if, of what courses theyve taken, 4 9 type of information get entered into that 5 10 system from your supervisor's training? 6 11 MS, TSOCHAS: The software that Videotel 7 12 has provided us, which was originally developed 8 13 by Video Tell to facilitate the C.B.T. but 9 14 they've expanded that and it's actually a very, 10 15 very user friendly and it's been very user triendly and it's been very user and the file user as triendly and the very easy to understand. 10 15	1	6	Page 126	1	DFI	Page 128 VECCHIO REPORTING
yes of information get entered into that system from your supervisor's training? 11						
1					`	·
5 10 System from your supervisor's training? 6 11 MS. TSOCHLAS: The software that Videotel has provided us, which was originally developed by 12 has provided us, which was originally developed by 14 they've expanded that and it's actually a very, 10 15 very user friendly and it's been very useful to 15 very user friendly and it's been very useful to 16 us, it's web based, and it allows us to record 12 17 not just C.B.T. training, It allows the vessels 12 17 not just C.B.T. training, It allows the vessels 13 18 to record the videos they've watched, the DVDs 13 10 reaches a level that is a pass level. The way it is set up, 15 20 carried out, and it allows us to enter our 15 12 usperintendent training records into that 16 21 superintendent training records into that 17 22 database and it also allows us to make a 18 23 schedule. Often when a superintendent goes on board for attendance, hell see some areas of 12 25 weakness and hell leave a schedule for the 18 21 weskens and hell leave a schedule for the 19 vessel to carryout training. So, for the next 19 22 month on day one you'll do calibration of gas 19 vessel to carryout training. So, for the next 19 23 although it was originally developed by 10 to the flofficer, who is the 19 12 month on day one you'll do calibration of gas 19 14 the test he gets below pass level, he has to 19 14 the test he gets below pass level, he has to 19 14 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass level, he has to 19 15 the test he gets below pass lev			•		1	-
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22 DEL VECCHIO REPORTING 23 (203) 245-9583 20 then to complete the C.B.T. there's a test, 24 109 vessel to carryout training. So, for the next 25 1 vessel to carryout training. So, for the next Page 127 Page 127 Page 128 The test he gets below pass level, he has to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the straining officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to the training officer, and reminds him each day that to very communicative, it is well set up. I think DEL VECCHIO REPORTING (203) 245-9583 The test he gets below pass level, he has to the test he gets below pass level, he has to the tred the C.B.T. But, generally, because it is very communicative, it is well set up. I think DEL VECCHIO REPORTING (203) 245-9583 The test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has to the test he gets below pass level, he has	20	25	weakness and he'll leave a schedule for the	20	17	wrong, so if he gets a wrong answer, it will
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		Dog 120			Dog 122
1	19	Page 130 overall performance regarding safety and	1	11	Page 132 it.
2	20	environment.	2	12	We will break until one o'clock.
3	21	So, if we click on attachment 33, we have	3	13	(Whereupon, the luncheon recess
4	22	the procedure.	4	14	was held until 1:00 p.m.)
5	23	SPECIAL MASTER BUNDY: Who is included in	5	15	SPECIAL MASTER BUNDY: Please, Miss
6	24	the senior management?	6	16	Tsochlas, go ahead with the slide number six,
7	25	MS. TSOCHLAS: It's all the heads of	7	17	topic number six.
8			8	18	MS. TSOCHLAS: Item number six of the
9	DEL	VECCHIO REPORTING	9	19	agenda is regarding the implementation of the
10	(2	203) 245-9583	10	20	requirements of the minimum engineering risk
11		112	11	21	mitigation measures. And here we'll also have
12	1	departments that are operationally involved.	12	22	an analysis of the findings made by Captain
13	2	The technical manager, the crew manager, the	13	23	Wigger during the onboard audits.
14	3	operations manager, the safety and quality	14	24	Now, the first thing I have here is a list
15	4	manager, and the managing director aboard the	15	25	of those a summary of those measures as to
16	5	vessels.	16		
17	6	That's the procedure. And in the next	17	DEI	_ VECCHIO REPORTING
18	7	attachment is an example of that report. This	18	((203) 245-9583
19	8	was actually completed by Mr. Karagiorgis in	19		114
20	9	August when just before Captain Wigger boarded	20	1	the scope of work.
21	10	the vessel. It's not entirely focused on the	21	2	We are required to implement an
22	11	environment, it has all the elements of the	22	3	environmental tag system. Numbered seals
23	12	co-management system, but you can see it's very	23	4	should be installed to prevent unauthorized
24	13	transparent. There's positive and negative	24	5	opening through any hull connection. The seals
25	14	feedback. I think that's one of the most	25	6	will be installed to prevent unauthorized
		Page 131			Page 133
1	15	important changes that has taken place over the	1	7	opening of any through hull connection.
2	16	last four years with our company, we have	2	8	They'll be nonreusable and uniquely numbered.
3	17	become a very transparent company.	3	9	We'll have a seal logbook maintained onboard to
4	18	Are there any questions?	4	10	record whenever a seal is affixed or removed,
5	19	SPECIAL MASTER BUNDY: It might be a good	5	11	including the date, time, the seal number
6	20	idea it's now about quarter to 12, if we	6	12	removed, the seal number affixed, and the
7	21	broke for lunch and be back here at one, then	7	13	personnel involved, and the reason for the
8	22	we can take up the minimum engineering risk	8	14	change. Spare seals shall be maintained by the
9	23	mitigation measures, part of it which is a lot	9	15	Master at a secure location.
10	24	more specific engineering issues, and, perhaps,	10	16	In yellow is the requirement from the
11	25	then, Mr. O'Connell, we can go through some of	11	17	scope of work. In white font is what we've
12			12	18	done to implement that requirement. So, we
13	DEL	VECCHIO REPORTING	13	19	have a procedure in place requiring that
14	(2	203) 245-9583	14	20	nonreusable unique identified seals are placed
15		113	15	21	on all flanges on the engine room, sludge
16	1	your questions with regard to the spreadsheet	16	22	lines, bilge lines, sewage and gray water,
17	2	vetting or audit issues.	17	23	overboard lines, and boiler down lines as per
18	3	MR. O'CONNELL: Okay.	18	24	ship specific guidelines which are prepared by
19	4	SPECIAL MASTER BUNDY: Any other things	19	25	the company's technical department. So, we
20	5	that we think we should be sure and cover?	20	_	
21	6	And if I could ask in the break perhaps	21		VECCHIO REPORTING
22	7	Mr. Karagiorgis or somebody else, if you could	22	((203) 245-9583
23	8	find in the area which talks about what	23	4	115
24	9	documents are sent by the vessels every month,	24	1	give them a diagram showing where seals should
25	10	so my report I'll be able to compare those to	25	2	be installed on the vessel. And we have a

1	3	Page 134 bound seal book that's maintained in accordance	1	24	Page 136 and all such blank flanges are provided on the
2	4	with the requirements and the Master maintains	2	25	drawing that's been provided to the vessel with
3	5	an inventory of spare seals onboard, which	3	23	drawing that's been provided to the vesser with
4	6	those seals are under his control.	4	DFI	VECCHIO REPORTING
5	7	The procedure has been incorporated into	5		203) 245-9583
6	8	our environmental management plan. The first	6	(-	117
7	9	attachment shows a sample of the engine room	7	1	the seal logbook.
8	10	seal logbook with directions and the form	8	2	Shall we go to the next slide? We have a
9	11	that's completed. The second attachment is an	9	3	requirement that we have to bilge something has
10	12	example of the spare seal logbook. The logbook	10	4	to be carried out in the presence of the IEC
11	13	that's used to record the inventory of spare	11	5	during his onboard orders. Those samples must
12	14	seals available onboard. And the third	12	6	be sent to a laboratory for analysis and then
13	15	attachment is the procedure that's in place.	13	7	the analysis report must be sent to the makers
14	16	So, if we move to the next slide. Bilge	14	8	of the oily water separator and the oil content
15	17	main cross connections, the deck plates near	15	9	meter in order to verify that they do not
16	18	the cross connections and the valve bodies	16	10	influence the capability of the two systems to
17	19	should be painted in orange and a brightly	17	11	process fluids having this content. The
18	20	colored sign with three inch letters must be	18	12	procedure has been incorporated into our manual
19	21	permanently fixed warning it's a bilge system	19	13	in accordance with the requirements of the
20	22	piping crossover and for emergency use only,	20	14	scope of work.
21	23	and seals will be placed on the system.	21	15	Attachment 44 is an example of an analysis
22	24	Now, we have instructions that have been	22	16	report received from the laboratory that
23	25	included in the environmental management plan,	23	17	carried out the analysis. Each page is for a
24			24	18	different sample from within the vessel. The
25	DEL	VECCHIO REPORTING	25	19	laboratory analyzes the content of the fluids
		Page 135			Page 137
1	(2	Page 135 (203) 245-9583	1	20	Page 137 that are taken in those samples and then we
1 2	(2	Page 135 203) 245-9583 116	1 2	20 21	=
	(2 1	203) 245-9583			that are taken in those samples and then we
2		203) 245-9583 116	2	21	that are taken in those samples and then we send this analysis to the makers. As you can
2	1	203) 245-9583 116 attachment 38 shows a picture of the sign near	2	21 22	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the
2 3 4	1 2	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next	2 3 4	21 22 23	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and
2 3 4 5	1 2	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted	2 3 4 5	21 22 23 24	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator
2 3 4 5 6	1 2 3 4	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the	2 3 4 5 6	21 22 23 24 25	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator
2 3 4 5 6 7	1 2 3 4 5	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of	2 3 4 5 6 7	21 22 23 24 25 DEL	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect
2 3 4 5 6 7 8	1 2 3 4 5 6	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation.	2 3 4 5 6 7 8	21 22 23 24 25 DEL	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING
2 3 4 5 6 7 8 9	1 2 3 4 5 6 7	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements	2 3 4 5 6 7 8 9 10 11	21 22 23 24 25 DEL	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems.
2 3 4 5 6 7 8 9	1 2 3 4 5 6 7 8	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental	2 3 4 5 6 7 8 9	21 22 23 24 25 DEL (2	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583
2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan.	2 3 4 5 6 7 8 9 10 11	21 22 23 24 25 DEL (2	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems.
2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and	2 3 4 5 6 7 8 9 10 11 12 13 14	21 22 23 24 25 DEL (2	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire
2 3 4 5 6 7 8 9 10 11 12 13	1 2 3 4 5 6 7 8 9 10 11 12 13	203) 245-9583 116 attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a	2 3 4 5 6 7 8 9 10 11 12 13 14 15	21 22 23 24 25 DEL (2 1 2 3	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	1 2 3 4 5 6 7 8 9 10 11 12 13 14	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	21 22 23 24 25 DEL (2 1 2 3 4	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	21 22 23 24 25 DEL (2 1 2 3 4 5	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that measure and scope of work has been properly	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental management plan. The end connecting to the oil
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that measure and scope of work has been properly implemented onboard.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10 11	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental management plan. The end connecting to the oil water separator discharge pipe must be fitted
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that measure and scope of work has been properly implemented onboard. All blank flanges that are potentially	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental management plan. The end connecting to the oil water separator discharge pipe must be fitted with a manual valve or a tamperproof automatic
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that measure and scope of work has been properly implemented onboard. All blank flanges that are potentially removable associated with any piping leading	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12 13	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental management plan. The end connecting to the oil water separator discharge pipe must be fitted with a manual valve or a tamperproof automatic valve, this is included in the logbooks of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	attachment 38 shows a picture of the sign near the bilge system piping crossover, and the next picture showing that they've been painted international orange. It's from one of the vessels that is covered by the terms of probation. The next attachment shows the requirements that's been incorporated into the environmental management plan. So, shall we go to the next slide? All emergency bilge sections shall also be painted brightly and labeled for emergency use only and seals will be placed on them. We have a photograph of one of the examples from one of our vessels in attachment 40, and 41 is the procedure that's been incorporated into the environmental management plan. So, that measure and scope of work has been properly implemented onboard. All blank flanges that are potentially	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	21 22 23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10 11 12	that are taken in those samples and then we send this analysis to the makers. As you can see in attachment 45, we have feedback from the oil content meter maker, and Spanmarin, and from the maker of the oily water separator concerning that the bilge waters do not affect VECCHIO REPORTING 203) 245-9583 118 the operation and condition of our systems. So, if we move to the next slide, this is a list of additional oily water separator and oil content meter requirements. The entire length of the sample line from the oily water separator discharge connection to the sample flush line control valve must be painted a bright color. We included this requirement in the relevant procedure in our environmental management plan. The end connecting to the oil water separator discharge pipe must be fitted with a manual valve or a tamperproof automatic

1	1/	Page 138	_	0	Page 140
1	16	done with the use of the lockbox. Monthly	1	8	MR. O'CONNELL: And when did that occur?
2	17	operational tests of the oily water separator	2	9	MS. TSOCHLAS: Immediately following the
3	18	and the oil content meter are to be carried out	3	10	order where it was identified.
4	19	and recorded in the oil record book. The	4	11	MR. CHALOS: You're looking for a year?
5	20	requirements are an annual procedure of the	5	12	MR. O'CONNELL: I'm looking for a year.
6	21	environmental management plan. The oil content	6	13	MS. TSOCHLAS: It was identified when
7	22	meter will be re-calibrated at least annually	7	14	did you do the order?
8	23	by an external and authorized technician.	8	15	MR. KARAGIORGIS: In May.
9	24	That's also been included in the requirements	9	16	MS. TSOCHLAS: It was corrected within
10	25	of the environmental management plan. And the	10	17	June.
11	DEL	VEGOLUO DEPORTINO	11	18	MR. CHALOS: And that was approved?
12		VECCHIO REPORTING	12	19	MR. KARAGIORGIS: That does not require
13	(203) 245-9583	13	20	approval because it's
14	4	119	14	21	SPECIAL MASTER BUNDY: Because it's a
15	1	oily water separator source pipe, the bilge	15	22	what?
16	2	holding tank, shall be cleaned at least every	16	23	MS. TSOCHLAS: It's a minor modification.
17	3	six months.	17	24	MR. O'CONNELL: That was an original
18	4	This has been included in the requirements	18	25	requirement in the scope of work documents, is
19	5	of the environmental management plan.	19	D.E.	VESSULO DEDODTINO
20	6	And if we open up attachment 46, all of	20		VECCHIO REPORTING
21	7	those requirements have been included in this	21	(203) 245-9583
22	8	procedure that's been highlighted.	22	_	121
23	9	SPECIAL MASTER BUNDY: Wasn't there some	23	1	that correct?
24	10	difficulty with the import testing on some of	24	2	MS. TSOCHLAS: The ability to carry out a
25	11	the vessels?	25	3	full water test in the oily water separator.
		Page 139			Page 141
1	12	MS. TSOCHLAS: On the ESTIA, and that's	1	4	SPECIAL MASTER BUNDY: The ESTIA came
2	13	been corrected, that's been resolved.	2	5	the application was made for the ESTIA to be a
3	14	SPECIAL MASTER BUNDY: All right.	3	6	covered vessel
4	15	MR. O'CONNELL: What was the problem with	4	7	MS. TSOCHLAS: In March of I was
5	16	the ESTIA?	5	8	getting ready to have my baby, it was February
6	17	MS. TSOCHLAS: We weren't able to carry	6	9	of 2011.
7	18	out a full operational test import, so we had	7	10	SPECIAL MASTER BUNDY: Okay.
8	19	to make a minor modification to the system in	8	11	MS. TSOCHLAS: It was the 3rd of March.
9	20	order for that to be achieved.	9	12	SPECIAL MASTER BUNDY: You remember it
10	21	MR. O'CONNELL: What was the problem with	10	13	well?
11	22	the import testing?	11	14	MS. TSOCHLAS: Yes, it was the night
12	23	MS. TSOCHLAS: Mr. Karagiorgis will be	12	15	before.
13	24	able to tell you better.	13	16	SPECIAL MASTER BUNDY: Please continue.
14	25	MR. KARAGIORGIS: From the system it was	14	17	MS. TSOCHLAS: So, the next requirement is
15		•	15	18	regarding recordkeeping.
16	DEL	VECCHIO REPORTING	16	19	All soundings and logs required by the
17	(203) 245-9583	17	20	vessel shall be retained onboard the vessel for
18		120	18	21	a period of three years from the final entry.
19	1	missing the pipe that connected the overboard	19	22	We have included the retention period in our
20	2	line with a return line to bilge oil tank.	20	23	environmental management plan.
20	_		21	24	You can see in this matrix which regards
21	3	This is the only thing that missed from the	- 1		Tod carr see in this matrix which regards
		This is the only thing that missed from the total from the design of the oil water	22	25	the maintenance of our documentation, the
21	3				_
21 22	3 4	total from the design of the oil water	22	25	_
21 22 23	3 4 5	total from the design of the oil water separator. The system on PLOUTOS had already	22 23	25 DEL	the maintenance of our documentation, the

		D 140			D 444
1		Page 142 122	1	21	Page 144 environmental management plan.
2	1	retention period, the column for retention	2	22	Shall we go to the next slide?
3	2	period is three years.	3	23	The next requirement is regarding fuel
4	3	If we go to the next slide, this regards	4	24	oil/lube oil purifier setting and line breaks.
5	4	oil record book entries, entries made into the	5	25	· -
l .	5	oil record book part one must be made by the		25	Standard system for monitoring fuel oil and
6 7	6	chief engineer and each page must be signed by	6 7	DEI	. VECCHIO REPORTING
1	7				
8		the chief engineer and the Master.	8	((203) 245-9583
9	8	So, we have a copy from one of the oil	9	1	124
10	9 10	record books that shows that each entry is made	10	1	lube oil management, including the waste
		by the chief engineer. You can see his name at	11	2	produced by operations in the purifiers must be
12	11	the bottom of each entry, and the bottom of	12	3	developed. Any extraordinary operations such
13	12	each page is signed by the chief engineer and	13	4	as the need for frequent draining of fuel oil
14	13	the Master.	14	5	service and settling tanks and engine lube oil
15	14 15	SPECIAL MASTER BUNDY: This is part of the	15	6	sump tanks of excessive water or other problems
16	15	documentation that comes every month?	16	7	such as waxing, compatibility, stratification,
17 18	16 17	MS. TSOCHLAS: Yes, it is.	17	8	or contamination shall be provided for the
		And the next attachment, 49, shows the	18	9	handling of unburned sludges and waste
19	18	guidelines that are provided to our chief	19	10	management. Any unintended release of fluid in
20	19	engineers onboard regarding the requirement.	20	11	the engine room shall be reported and an
21	20 21	SPECIAL MASTER BUNDY: This procedure, how	21	12	explanation as to how it should be handled, and
22		long have you had this specific procedure in	22	13	we discussed this process at the beginning of
23	22	environmental management.	23	14 15	the presentation, and we have this requirement
24	23	MS. TSOCHLAS: Regarding the	24	15	in the environmental management plan. The
25	24	implementation of oil record entry?	25	16	vessels maintain a logbook in order to record
		Page 143			Page 145
1	25	SPECIAL MASTER BUNDY: Yes.	1	17	all such issues.
2			2	18	And, here, again, we have the attachment
3	DEL	VECCHIO REPORTING	2	19	that indicates the same the procedure.
4		VEGGING REPORTING	3	1 /	that indicates the same the procedure.
	(2	203) 245-9583	4	20	The next item is regarding oil to sea
5	(2		_		· · · · · · · · · · · · · · · · · · ·
5 6	1	203) 245-9583	4	20	The next item is regarding oil to sea
	1 2	203) 245-9583 123	4 5	20 21	The next item is regarding oil to sea interfaces. We also discussed that at the
6	1	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of	4 5 6	20 21 22	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a
6 7	1 2	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan.	4 5 6 7	20 21 22 23	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil
6 7 8	1 2 3	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009.	4 5 6 7 8	20 21 22 23 24	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place
6 7 8 9	1 2 3 4	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any	4 5 6 7 8 9	20 21 22 23 24 25	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place
6 7 8 9 10	1 2 3 4 5	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the	4 5 6 7 8 9	20 21 22 23 24 25	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental
6 7 8 9 10 11	1 2 3 4 5 6	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits?	4 5 6 7 8 9 10	20 21 22 23 24 25	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental. VECCHIO REPORTING
6 7 8 9 10 11 12	1 2 3 4 5 6 7	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have	4 5 6 7 8 9 10 11 12	20 21 22 23 24 25	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583
6 7 8 9 10 11 12 13	1 2 3 4 5 6 7 8	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to	4 5 6 7 8 9 10 11 12 13	20 21 22 23 24 25 DEL	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583
6 7 8 9 10 11 12 13 14	1 2 3 4 5 6 7 8	123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations.	4 5 6 7 8 9 10 11 12 13 14	20 21 22 23 24 25 DEL	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well,
6 7 8 9 10 11 12 13 14 15	1 2 3 4 5 6 7 8 9	203) 245-9583 123 MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would	4 5 6 7 8 9 10 11 12 13 14 15	20 21 22 23 24 25 DEL (The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our
6 7 8 9 10 11 12 13 14 15 16	1 2 3 4 5 6 7 8 9 10	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent	4 5 6 7 8 9 10 11 12 13 14 15 16	20 21 22 23 24 25 DEL (1 2 3	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the
6 7 8 9 10 11 12 13 14 15 16	1 2 3 4 5 6 7 8 9 10 11 12	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why	4 5 6 7 8 9 10 11 12 13 14 15 16 17	20 21 22 23 24 25 DEL (1 2 3 4	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again,
6 7 8 9 10 11 12 13 14 15 16 17	1 2 3 4 5 6 7 8 9 10 11 12 13	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	20 21 22 23 24 25 DEL (1 2 3 4 5	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental. VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure.
6 7 8 9 10 11 12 13 14 15 16 17 18	1 2 3 4 5 6 7 8 9 10 11 12 13 14	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the 30th of September.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	20 21 22 23 24 25 DEL (1 2 3 4 5 6	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure. The next slide regarding the fleet
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the 30th of September. So, the next requirement regards a tank	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	20 21 22 23 24 25 DEL (1 2 3 4 5 6 7	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure. The next slide regarding the fleet engineering study. We have to have a system in
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the 30th of September. So, the next requirement regards a tank sounding record book. Sounding of all waste,	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	20 21 22 23 24 25 DEL (1 2 3 4 5 6 7 8	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental. VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure. The next slide regarding the fleet engineering study. We have to have a system in place where all shipboard engineers will provide information and ideas as to how to make the oily separator or oil content meter
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the 30th of September. So, the next requirement regards a tank sounding record book. Sounding of all waste, sludge, and bilge shall be carried out on a	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	20 21 22 23 24 25 DEL (1 2 3 4 5 6 7 8 9 10 11	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental. VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure. The next slide regarding the fleet engineering study. We have to have a system in place where all shipboard engineers will provide information and ideas as to how to make
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MS. TSOCHLAS: Since the implementation of the revised environmental management plan. Since July of 2009. SPECIAL MASTER BUNDY: Have you made any significant changes to this as a result of the audits? MS. TSOCHLAS: More of the changes have been made as a result of the change to regulations. SPECIAL MASTER BUNDY: And that would include the recent MS. TSOCHLAS: Yes, they do. That's why the revision you'll see in the header is the 30th of September. So, the next requirement regards a tank sounding record book. Sounding of all waste, sludge, and bilge shall be carried out on a daily basis, and the tank sounding book should	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	20 21 22 23 24 25 DEL (1 2 3 4 5 6 7 8 9 10	The next item is regarding oil to sea interfaces. We also discussed that at the beginning of the presentation. There must be a system in order to monitor equipment having oil to sea interfaces, we have a procedure in place that's been incorporated in our environmental. VECCHIO REPORTING (203) 245-9583 125 management plan. As I said earlier as well, the only system that we have onboard our vessels that have oil to sea interface is the stern tube. And here the attachment, again, shows the procedure. The next slide regarding the fleet engineering study. We have to have a system in place where all shipboard engineers will provide information and ideas as to how to make the oily separator or oil content meter

					2 110
1	13	Page 146 reducing or handling waste accumulations within	1	5	Page 148 over the period of probation.
2	14	engine rooms, machinery spaces, or pump rooms.	2	6	SPECIAL MASTER BUNDY: So, this includes
3	15	Now, we have a procedure in place for the	3	7	all of the ones that you put out before on the
4	16	fleet engineering survey, we've discussed it	4	8	IEC audits, including the recordkeeping audits?
5	17	extensively throughout the hearings, we have	5	9	MS. TSOCHLAS: Some of them were
6	18	begun originally with one format, which was	6	10	overlapping, some you'll see a second time.
7	19	extensively revised based on suggestions made	7	11	SPECIAL MASTER BUNDY: All of them, no
8	20	by Captain Wigger and by the Coast Guard. A	8	12	matter what they are, should be in this
9	21	fleet engineering survey is required to be	9	13	section, we wouldn't have to go back to the
10	22	completed by all engine officers within three	10	14	other one?
11	23	months of their signing onto a company vessel.	11	15	MS. TSOCHLAS: Not necessarily, because
12	24	Those surveys those completed surveys are	12	16	there were a number of recommendations that
13	25	committed to the CCM for review and any	13	17	were for example, the implementation of a
14		,	14	18	separate environmental management plan, that's
15	DEL '	VECCHIO REPORTING	15	19	not a requirement from the scope of work, but
16		03) 245-9583	16	20	it was a recommendation to improve our
17	,	126	17	21	performance. So, it's not necessary, but all
18	1	constructive feedback that is provided by our	18	22	of the recommendations have been included.
19	2	seafarers is assessed for implementation.	19	23	SPECIAL MASTER BUNDY: So, what we've got
20	3	SPECIAL MASTER BUNDY: Have you come up	20	24	here are the ones that are just
21	4	with anything?	21	25	MS. TSOCHLAS: Directly related.
22	5	MS. TSOCHLAS: We haven't really come up	22		•
23	6	with anything constructive.	23	DEL	VECCHIO REPORTING
24	7	SPECIAL MASTER BUNDY: It seemed like a	24	(2	203) 245-9583
25	8	nice idea at the time.	25		128
	_	Page 147			Page 149
1	9	MS. TSOCHLAS: It did, but, you know,	1	1	SPECIAL MASTER BUNDY: To the scope of
2	10	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative.	2	2	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of
2	10 11	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and	2	2	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with.
2 3 4	10 11 12	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A	2 3 4	2 3 4	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized,
2 3 4 5	10 11 12 13	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over	2	2	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book,
2 3 4 5 6	10 11 12 13 14	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years.	2 3 4 5 6	2 3 4 5 6	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator
2 3 4 5 6 7	10 11 12 13 14 15	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those	2 3 4 5 6 7	2 3 4 5 6 7	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement.
2 3 4 5 6 7 8	10 11 12 13 14 15 16	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of	2 3 4 5 6 7 8	2 3 4 5 6 7 8	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings
2 3 4 5 6 7 8 9	10 11 12 13 14 15 16 17	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation	2 3 4 5 6 7 8 9	2 3 4 5 6 7 8 9	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written
2 3 4 5 6 7 8 9	10 11 12 13 14 15 16 17	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation measures. We're in full compliance with all of	2 3 4 5 6 7 8 9	2 3 4 5 6 7 8 9	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written requirements regarding fleet engineering
2 3 4 5 6 7 8 9 10	10 11 12 13 14 15 16 17 18	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation measures. We're in full compliance with all of those requirements as has been observed by	2 3 4 5 6 7 8 9 10 11	2 3 4 5 6 7 8 9 10	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written requirements regarding fleet engineering surveys. These were all from the initial audit
2 3 4 5 6 7 8 9 10 11 12	10 11 12 13 14 15 16 17 18 19 20	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation measures. We're in full compliance with all of those requirements as has been observed by Captain Wigger onboard our vessels, especially	2 3 4 5 6 7 8 9 10 11 12	2 3 4 5 6 7 8 9 10 11 12	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written requirements regarding fleet engineering surveys. These were all from the initial audit onboard the THEO T in 2008, which resulted in
2 3 4 5 6 7 8 9 10 11 12 13	10 11 12 13 14 15 16 17 18 19 20 21	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation measures. We're in full compliance with all of those requirements as has been observed by Captain Wigger onboard our vessels, especially in the final audit.	2 3 4 5 6 7 8 9 10 11 12 13	2 3 4 5 6 7 8 9 10 11 12 13	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written requirements regarding fleet engineering surveys. These were all from the initial audit onboard the THEO T in 2008, which resulted in the development of the environmental management
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 DEL	MS. TSOCHLAS: It did, but, you know, engineers aren't very creative. And the attachment has the procedure and the form that is required to be completed. A lot of work went into updating this form over the years. So, if we go to the next slide those are all the requirements as per the scope of work regarding minimum risk mitigation measures. We're in full compliance with all of those requirements as has been observed by Captain Wigger onboard our vessels, especially in the final audit. If we go to the next slide, we have a summary of the findings reported by Captain Wigger during the onboard audits on our vessels. VECCHIO REPORTING 203) 245-9583 127 MR. CHALOS: This is all the audits?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SPECIAL MASTER BUNDY: To the scope of work and the nonconformities as to the scope of work that were then dealt with. MS. TSOCHLAS: Yes. So, as summarized, inadequate maintenance of the seal book, operational vesting of the oil water separator was not in accordance to the requirement. Discrepancies between the manual tank soundings and the SWOMS data. There was no written requirements regarding fleet engineering surveys. These were all from the initial audit onboard the THEO T in 2008, which resulted in the development of the environmental management plan. Discrepancies in the ship specific drawings indicating the location of seals. Incorrect coloring of the oily water separator discharge sampling line and flushing line. Revisions to the tank sounding log were recommended. Testing of the ODME was not recorded in the oil record book part two. The implementation of the revised fleet engineering survey form. Incorrect coloring and signage of

		2 450			2 450
1		Page 150	1	18	Page 152 Was that a recordkeeping problem or was an
2	DFI	VECCHIO REPORTING	2	19	actual problem that it wasn't being tested?
3		203) 245-9583	3	20	MS. TSOCHLAS: It was a problem with the
4	(2	129	4	21	method of it being tested.
5	1	not placed on oil discharge flanges. Seals	5	22	The shipboard personnel were carrying out
6	2	were not placed on steam lines of high and low	6	23	the test of the oily water separator and the
7	3	steam chests. And some of these seals that	7	24	oil content meter, but it was not in complete
8	4	were placed in systems were due to a difference	8	25	compliance with our guide, with the fluid that
9	5	in interpretation of the requirements. Our	9		gana,
10	6	technical department carried out an assessment	10	DEL	. VECCHIO REPORTING
11	7	of the situation onboard and decided which	11		203) 245-9583
12	8	lines were supposed to have seals on them	12	`	131
13	9	because they were at risk of being able to use	13	1	we have available onboard to test the oily
14	10	to discharge overboard, and one of the auditors	14	2	water separator and oil content meter. That is
15	11	considered that additional seals had to be	15	3	one element of the recommendation. There was
16	12	placed on other systems. Sample bottles for	16	4	another element as well regarding the review of
17	13	sampling bilge water were not available onboard	17	5	the memory card.
18	14	at the time of the audit. Seals were not	18	6	MR. CHALOS: Were those observations dealt
19	15	placed on the discharge side of the oily water	19	7	with?
20	16	separator. The SWOMS was unable to transmit	20	8	MS. TSOCHLAS: Yes, all of the
21	17	automatically. Operation of the oily water	21	9	observations that have been made by Captain
22	18	separator was at a rate above that of its	22	10	Wigger have been closed out.
23	19	declared capacity. Various discrepancies in	23	11	SPECIAL MASTER BUNDY: I noticed this
24	20	the seal logbook. The tank sounding logbook	24	12	spreadsheet, you just have the observation and
25	21	was not maintained in the ECR. The chief	25	13	the response, and not the correction and
		Page 151			Page 153
1		rage 131			
1	22	engineer was keeping it in his office.	1	14	-
2	22 23	engineer was keeping it in his office. And if we go to the next slide, we have	1 2	14 15	prevention? MS. TSOCHLAS: Yes. That was so that it
		And if we go to the next slide, we have			prevention? MS. TSOCHLAS: Yes. That was so that it
2	23		2	15	prevention?
2 3	23 24	And if we go to the next slide, we have the spreadsheet of all of those items and our	2	15 16	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said
2 3 4	23 24 25	And if we go to the next slide, we have the spreadsheet of all of those items and our	2 3 4	15 16 17	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database
2 3 4	23 24 25 DEL	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved	2 3 4	15 16 17 18	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more
2 3 4 5 6	23 24 25 DEL	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING	2 3 4 5 6	15 16 17 18 19	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain
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2 3 4 5 6 7 8	23 24 25 DEL (2	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130	2 3 4 5 6 7 8	15 16 17 18 19 20 21	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if
2 3 4 5 6 7 8 9	23 24 25 DEL (2	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130 the issues.	2 3 4 5 6 7 8 9	15 16 17 18 19 20 21 22 23 24	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if you would be asked well, it said that in
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2 3 4 5 6 7 8 9 10 11 12 13 14	23 24 25 DEL (2 1 2 3 4	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130 the issues. SPECIAL MASTER BUNDY: This would probably be a good time, Mr. O'Connell, for you to go into any questions you have on these audits and the response to the audits. MR. O'CONNELL: Number 20 regarding the	2 3 4 5 6 7 8 9 10 11 12 13 14	15 16 17 18 19 20 21 22 23 24 25	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if you would be asked well, it said that in the response it said that instructions shall be provided to the vessels in order to ensure that the testing fluid was used, et cetera, that
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	23 24 25 DEL (2 1 2 3 4 5 6 7 8	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130 the issues. SPECIAL MASTER BUNDY: This would probably be a good time, Mr. O'Connell, for you to go into any questions you have on these audits and the response to the audits. MR. O'CONNELL: Number 20 regarding the THEO T. MS. TSOCHLAS: So, you're looking at the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	15 16 17 18 19 20 21 22 23 24 25 DEL	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if you would be asked well, it said that in the response it said that instructions shall be provided to the vessels in order to ensure that the testing fluid was used, et cetera, that VECCHIO REPORTING 203) 245-9583
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	23 24 25 DEL (2 1 2 3 4 5 6 7 8 9	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130 the issues. SPECIAL MASTER BUNDY: This would probably be a good time, Mr. O'Connell, for you to go into any questions you have on these audits and the response to the audits. MR. O'CONNELL: Number 20 regarding the THEO T. MS. TSOCHLAS: So, you're looking at the last spreadsheet?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	15 16 17 18 19 20 21 22 23 24 25 DEL	prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if you would be asked well, it said that in the response it said that instructions shall be provided to the vessels in order to ensure that the testing fluid was used, et cetera, that VECCHIO REPORTING 203) 245-9583 132 that was done and that was documented in your
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	23 24 25 DEL (2 1 2 3 4 5 6 7 8 9 10	And if we go to the next slide, we have the spreadsheet of all of those items and our response to Captain Wigger of how we resolved VECCHIO REPORTING 203) 245-9583 130 the issues. SPECIAL MASTER BUNDY: This would probably be a good time, Mr. O'Connell, for you to go into any questions you have on these audits and the response to the audits. MR. O'CONNELL: Number 20 regarding the THEO T. MS. TSOCHLAS: So, you're looking at the last spreadsheet? MR. O'CONNELL: Yes, ma'am. I'm sorry.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	15 16 17 18 19 20 21 22 23 24 25 DEL (prevention? MS. TSOCHLAS: Yes. That was so that it could be in line with exactly what we've said with Captain Wigger. We have our own database that has the actions, but it's kind of more summarized, whereas the response to Captain Wigger provided a more detailed explanation. SPECIAL MASTER BUNDY: So, I take it if you would be asked well, it said that in the response it said that instructions shall be provided to the vessels in order to ensure that the testing fluid was used, et cetera, that VECCHIO REPORTING 203) 245-9583 132 that was done and that was documented in your own internal records?
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Page 154 1 10 for, recommended revision of seal procedures. 1 12 And you indicated that you were reviewing the page 154 for for, recommended revision of seal procedures. 2 11 And you indicated that you were reviewing the page 154 for for, recommended revision of seal procedures. 3 12 procedures. I would also note the first - in that audit was the use of the appropriate that share you call it, or an observation, or that swhart you call it, or an observation, or the excuse me, from 2009 that also deads with the seal all gor maintaining seals, I should say. 3 17 seal log or maintaining seals, I should say. 4 18 Do you do you feel that Ionia has a foregoing or that Ionia has a foregoing or you feel that Ionia has a foregoing or that Ionia ha						
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1	22	Page 158	1	15	Page 160
1 2	23 24	a question. When you went on the PLOUTOS, when you did the operational testing, did you have	1	15 16	issues with the seals are a continuing problem?
3	25	the right fluid?	3	17	MS. TSOCHLAS: They have been a continuing problem. I think, though, we have come to the
4	23	the right hala:	4	18	bottom of a number of the problems and we've
5	DEI	VECCHIO REPORTING	5	19	probably are going to see less and less issues.
6		203) 245-9583	6	20	MR. O'CONNELL: Number 50. I have a
7	(2	136	7	21	question, this kind of goes back to what we
8	1	MR. WIGGER: Yes. Prior to the operation	8	22	were talking about earlier in the day, but
9	2	of the test itself, we tested the OCM with the	9	23	there was a discrepancy of 8.6 percent in the
10	3	fluid and, of course, there's a range there	10	24	bilge oil tank. Now is that something that you
11	4	that's required that you should get a base of 5	11	25	knew about before the audit took place or did
12	5	PPM, or whatever, but based upon the mixture of	12	20	knew about before the addit took place of aid
13	6	fluid, so we did that and then we actually did	13	DFI	VECCHIO REPORTING
14	7	startup the OWS and we were on a wave course,	14		203) 245-9583
15	8	so we did do an overboard discharge, which was,	15	(-	138
16	9	basically, an operation for OWS, which was	16	1	you find out about that after the audit?
17	10	basically a testing.	17	2	MS. TSOCHLAS: We knew about it before the
18	11	MR. CHALOS: How about the chief engineer,	18	3	audit. All kind of discrepancies we knew
19	12	was he able to read most of them?	19	4	before the audit.
20	13	MR. WIGGER: He was very knowledgeable. I	20	5	SPECIAL MASTER BUNDY: Which one are we
21	14	could say that without reservation. He is very	21	6	looking at?
22	15	familiar with it.	22	7	MR. O'CONNELL: 50.
23	16	MS. TSOCHLAS: He was the specific chief	23	8	It says the chief engineer thinks that the
24	17	engineer that was onboard the THEO T during the	24	9	discrepancy is due to the bilge tank being
25	18	initial audit that was carried out, as well, so	25	10	heated and there is vapor in the tank. Is that
		Page 159			Page 161
1	19	he has a lot of experience to do with proper	1	11	what was ultimately determined or was there a
2	20	he has a lot of experience to do with proper implementation of the environmental compliance	2	12	what was ultimately determined or was there a different calibration issue?
2 3	20 21	he has a lot of experience to do with proper implementation of the environmental compliance requirements.	2	12 13	what was ultimately determined or was there a different calibration issue? MS. TSOCHLAS: We had a technician go
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		Page 162			Page 164
1	7	each other, you can just choose one, if they're	1	C	203) 245-9583
2	8	not, then you want to just double-check to make	2		141
3	9	sure you got the right sounding, because it is	3	1	INTERTANKO, or
4	10	a finesse as far as where that bottom of the	4	2	MS. TSOCHLAS: No, we're not members of
5	11	tank is.	5	3	INTERTANKO. We're not on any we have a
6	12	MS. TSOCHLAS: And we have implemented	6	4	member on the technical committee of the Greek
7	13	that recommendation in our procedure.	7	5	branch of the Bureau Veritas, we have a member
8	14	MR. WIGGER: Right. And I did observe	8	6	of our employment on the technical committee.
9	15	that onboard the PLOUTOS with the three	9	7	MR. O'CONNELL: One of the questions that
10	16	soundings.	10	8	I know it's in one of these spreadsheets, but I
11	17	MR. O'CONNELL: Number 52, this has to do	11	9	don't have I can't find it in the
12	18	with a full operation of the test for the OWS	12	10	spreadsheet, but it's in the THEO T audit, and
13	19	for the ESTIA. Did we talk about this already?	13	11	we talked about this at the last hearing, but I
14	20	MS. TSOCHLAS: Yes, it's what we talked	14	12	didn't think we got to the bottom of the
15	21	about earlier.	15	13	explanation that I began, I can't find exactly
16	22	SPECIAL MASTER BUNDY: Yes, we did.	16	14	where it is, but it had to do with the THEO T
17	23	MR. O'CONNELL: And we resolved that	17	15	and there was some discrepancy with whether the
18	24	issue.	18	16	incinerator was operational in October of 2010
19	25	On 61 and 62, is this the same issue with	19	17	when they did the audit and the auditor saying
20			20	18	that it wasn't, and I think that you had
21		VECCHIO REPORTING	21	19	explained at some point that that was just a
22	(:	203) 245-9583	22	20	clerical error. Can you remind me of what that
23		140	23	21	was?
24	1	the OWS test, that it wasn't carried out?	24	22	MS. TSOCHLAS: The chief engineer when he
25	2	MS. TSOCHLAS: It's the same issue that we	25	23	made a request for additional spare parts in
		Page 163			Page 165
1	3	9	1	24	Page 165 his requisition made a note saying that the
1 2	3	Page 163 discussed earlier regarding the full operation of the oily water separator. That's 61. And	1 2	24 25	his requisition made a note saying that the
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2	4	discussed earlier regarding the full operation of the oily water separator. That's 61. And	2	25	his requisition made a note saying that the
2	4 5	discussed earlier regarding the full operation of the oily water separator. That's 61. And 62 is different, I think. Sixty-two has to do	2	25 DEL	his requisition made a note saying that the incinerator wasn't operating, but it was
2 3 4	4 5 6	discussed earlier regarding the full operation of the oily water separator. That's 61. And 62 is different, I think. Sixty-two has to do with a memory card and, again, the full	2 3 4	25 DEL	his requisition made a note saying that the incinerator wasn't operating, but it was
2 3 4	4 5 6 7	discussed earlier regarding the full operation of the oily water separator. That's 61. And 62 is different, I think. Sixty-two has to do with a memory card and, again, the full operational test.	2 3 4 5	25 DEL	his requisition made a note saying that the incinerator wasn't operating, but it was VECCHIO REPORTING 203) 245-9583
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2	21	was the issue in which the question was whether	2	13	MS. TSOCHLAS: And as I said, if you take into account at the moment Shell will not work
3	22	the chief engineer simply used a previous form	3	14	with us because we're on probation, we lose any
4	23	that somebody had put on there and that the	4	15	cargo that's related to Shell. And Exxon Mobil
5	24	form was	5	16	up until the TMSA that we carried out with our
6	25	MS. TSOCHLAS: And delete everything.	6	17	company was the same, we lost any Exxon
7		me. TeeenEte. Tind delete everything.	7	18	cargoes. It has affected our income.
8	DEL	VECCHIO REPORTING	8	19	MR. WIGGER: But as a result of the TMSA
9		203) 245-9583	9	20	audit being positive, that they've now accepted
10	(-	143	10	21	you?
11	1	SPECIAL MASTER BUNDY: He didn't delete	11	22	MS. TSOCHLAS: Yes.
12	2	everything from a previous form, he did it	12	23	MR. O'CONNELL: Can we go to the second
13	3	electronically and then sent it.	13	24	spreadsheet?
14	4	MS. TSOCHLAS: Yeah.	14	25	SPECIAL MASTER BUNDY: Sure.
15	5	SPECIAL MASTER BUNDY: Do you the judge	15		
16	6	was interested with this, I spoke with the	16	DEL	VECCHIO REPORTING
17	7	judge yesterday, and one of the question that	17	(203) 245-9583
18	8	she had, are you able to say in any kind of	18		145
19	9	reasonably rough way what the total cost has	19	1	MR. O'CONNELL: I didn't realize there was
20	10	been to Ionia for the compliance with the terms	20	2	multiple spreadsheets when I was going through
21	11	of probation, including the fees of all these	21	3	it.
22	12	people surrounding the table and everything	22	4	I believe we looked at the first
23	13	else?	23	5	spreadsheet in the presentation. The second
24	14	MS. TSOCHLAS: Well, there's a fine, which	24	6	one. It's related to recordkeeping.
25	15	we all know.	25	7	MS. TSOCHLAS: By the IEC or our internal
		D 1/7			David 1/0
1	16	Page 167 SPECIAL MASTER BUNDY: Without the fine	1	8	Page 169
1 2	16 17	SPECIAL MASTER BUNDY: Without the fine.	1 2	8	audits?
2	17	SPECIAL MASTER BUNDY: Without the fine. MS. TSOCHLAS: It works out if you put	1 2 3	9	audits? MR. O'CONNELL: That's a good question.
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		Page 170			Page 172
1	4	MS. TSOCHLAS: Exactly.	1	25	rationale, but, again, I'm thinking most of the
2	5	SPECIAL MASTER BUNDY: Is it that they	2		The state of the s
3	6	weren't entering it into the oil record book,	3	DEL	. VECCHIO REPORTING
4	7	the cleaning as well, is that the issue?	4	(:	203) 245-9583
5	8	MS. TSOCHLAS: There was also that issue,	5	•	148
6	9	yeah.	6	1	audits, we had pictures of the contents of the
7	10	SPECIAL MASTER BUNDY: So, the PMS system	7	2	bilge holding tank that indicate that it was
8	11	did not require cleaning by its terms, and as	8	3	very clean.
9	12	you would go through the task that the PMS	9	4	SPECIAL MASTER BUNDY: Mr. O'Connell,
10	13	system set, it just said inspect and clean if	10	5	you're still perusing?
11	14	necessary, but, in fact, the record showed that	11	6	MR. O'CONNELL: No, I don't have anymore
12	15	it was, in fact, cleaned.	12	7	questions.
13	16	MS. TSOCHLAS: Yes, it's been corrected.	13	8	SPECIAL MASTER BUNDY: Any questions,
14	17	MR. CHALOS: Mr. Bundy, if I could say, I	14	9	Mr. Chalos, to follow up on anything?
15	18	mean, overriding all of this, you know, the	15	10	MR. CHALOS: No, I think Miss Tsochlas did
16	19	cleaning of the bilge tank and the various	16	11	a terrific job of telling us exactly what
17	20	other things, you have these records that come	17	12	they're doing, how they're doing it, and, you
18	21	out of the SWOMS system and it shows you the	18	13	know, it's obvious to me that there's been a
19	22	average PPM that goes over the side, which is	19	14	tremendous improvement each time we have one of
20	23	always going to be less than 15. So, you're	20	15	these hearings, each time there's an audit, the
21	24	getting empirical data, you know, to back up	21	16	issues that are dealt with has given us a very,
22	25	the fact that these tanks are relatively clean,	22	17	very good final product here for compliance.
23			23	18	SPECIAL MASTER BUNDY: Anything, Captain
24		VECCHIO REPORTING	24	19	Wigger, that you believe is necessary to
25	(2	203) 245-9583	25	20	supplement anything that's been said?
		Page 171			Page 173
1		Page 171 147	1	21	Page 173 MR. WIGGER: Probably, just re-emphasizing
1 2	1	_	1 2	21 22	<u> </u>
	1 2	147			MR. WIGGER: Probably, just re-emphasizing
2		147 you know, throughout the whole period, and then, of course, every six months they're getting cleaned anyway, so it isn't as though	2	22	MR. WIGGER: Probably, just re-emphasizing overall from start to finish, understanding where Ionia was at the beginning of the process and where Ionia is now, as Mr. Chalos
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		Page 174			Page 176
1	17	MR. SANBORN: The thing that resonates	1	9	manning sources and training sources, and that
2	18	with me through all of these hearings is and	2	10	was not a one shot affair, Captain Suntays has
3	19	Captain Wigger said something which is that	3	11	gone out and met with those people and made
4	20	Ionia has been, at least from my perspective,	4	12	changes. But the attitude that I've seen in
5	21	very responsive to input. I've made a few	5	13	terms of the people has been what people I've
6	22	suggestions and they pale by comparison, but	6	14	come in contact with and has been mentioned
7	23	very not only responsive, but they've	7	15	here today is very positive. I viewed
8	24	implemented virtually all of them that made	8	16	religiously and carefully the audits as
9	25	sense, they've made very good use of systems,	9	17	everybody, I think, here has, and it's
10			10	18	unmistakable the progress that's been made.
11		VECCHIO REPORTING	11	19	I've seen the things that I would have
12	(2	203) 245-9583	12	20	hope to have seen from the get-go and I am very
13		150	13	21	pleased with what I've seen.
14	1	and I realize we have computer interests for	14	22	SPECIAL MASTER BUNDY: Does anybody else
15	2	some time, but they've used them very	15	23	have any questions? Any offer of any other
16	3	effectively for managing the processes, for	16	24	testimony, evidence, exhibits, anything like
17	4	communication, and for all of the things that	17	25	that?
18	5	you like to see in a heads-up company. I've	18		
19	6	been involved with, I think, seven of these	19	DEL	. VECCHIO REPORTING
20	7	cases, and two of which were very large	20	(203) 245-9583
21	8	companies, one managing over 100 ships, one	21		152
22	9	managing something like 220, and the number	22	1	Great. I think that we probably are about
23	10	keeps going up, they have as you would	23	2	wrapped up.
24	11	expect of companies that size, they would have	24	3	What I'm going to do is try to get to
25	12	systems because they would be crucial to all of	25	4	Judge Arterton within 10 days so that will give
		Page 175			Page 177
1	13	their operations. By comparison, we're talking	1	5	her a month or so to get out her final order on
2	14	about a company with half a dozen similar	2	6	how she's going to handle this.
3	15	configured ships and, essentially, the same	3	7	I would expect that there will be no
4	16	trade and, yet, they don't have to take their	4	8	surprises in this thing. So, we'll go ahead
5	17	hat off to anybody in terms of the quality of	5	9	and adjourn and I'll get my report out as soon
6	18	their systems and the application of those	6	10	as I possibly can and get it to the judge and
7	19	tools, not only in this area, but if you look	7	11	get it to everybody. So, I suppose if you have
8	20	through the training in some of the other areas	8	12	anything that you want me to add or object or
9	21	as well, safety, they've used their systems, I	9	13	whatever to it, you can get it into Judge
10	22	think, to a greater advantage.	10	14	Arterton and you'll have plenty of time to
11	23	The other thing that strikes me and it's a	11	15	decide it before the technical end of probation
12	24	thing that I look for, whether as a consultant	12	16	when she enters a final order.
13	25	in this case or as a Court appointed monitor in	13	17	MR. CHALOS: Yes, Mr. Bundy, Miss Tsochlas
14			14	18	has done a very nice job at the end in her
15		VECCHIO REPORTING	15	19	conclusory paragraph, it's slides 80 well,
16	(2	203) 245-9583	16	20	81.
17		151	17	21	SPECIAL MASTER BUNDY: Uh huh.
18	1	other cases, right from the get-go, I've been	18	22	(Affirmative).
19	2	looking for attitude. I met very early on in	19	23	MR. CHALOS: That kind of summarizes their
20	3	the process Ms. Tsochlas had just come	20	24	efforts, where they started and where they are
21	4	onboard and I met with the managing director	21	25	today, and, you know, I think the main
22	5	and all of the key people, and early on I saw	22		
23	6	at that initial meeting, I saw an emphasis of	23		. VECCHIO REPORTING
24	7	going into training with a great deal of	24	(203) 245-9583
25	8	hands-on and also working very closely with the	25		153

1	1	Page 178	1	Page 180 22
1	1	objective of the scope of work was to transform		
2	2	the company, if you will, from an environmental	2	23
3	3	scofflaw to a good corporate citizen, I think	3	24
4	4	they've done that, and they've done that with a	4	25
5	5	lot of hard work, with money, but most	5	DEL VECCINO DEDODINO
6	6	importantly it changed their culture, and that	6	DEL VECCHIO REPORTING
7	7	changed, as Mr. Sanborn said, starting from at	7	(203) 245-9583
8	8	the very top. I mean, you can't change the	8	155
9	9	culture from the bottom up, it's got to be from	9	1
10	10	the top down, and I think this company has done	10	2 CERTIFICATE
11	11	a great job in doing that.	11	3 STATE OF CONNECTICUT
12	12	As Mr. Wigger said, I'm involved in a lot	12	4 ss: New Haven
13	13	of these cases and their performance has been	13	5 COUNTY OF NEW HAVEN
14	14 15	exceptional and I think it's deserving of	14	6
15	15	from the standpoint of probation of ending the	15	7 I, Victorine Kaliszewski, a Notary
16	16	probation on a high note. They've done what	16	8 Public in and for the State of Connecticut, duly
17	17	they've been asked and Miss Tsochlas has said	17	9 commissioned and qualified and authorized to
18	18	before, they intend to continue, you know, they	18	10 administer oaths, do hereby certify that I was
19	19	put a lot of money and a lot of effort in this	19	11 attended at the United States District Court,
20	20	and it has paid off not only in terms of	20	12 District of Connecticut, 141 Church Street, New
21	21	meeting probation and meeting the conditions of	21	13 Haven, Connecticut, on October 19, 2011, starting at
22	22	probation, but in terms of their standing in	22	9:00 a.m., by counsel for the respective parties as
23	23	the industry. So, they have a motive to	23	15 appears in the herein-entitled cause, SPECIAL
24	24 25	continue doing it, and based on what Miss	24	16 MASTER'S HEARING; that said witnesses were duly
25	25	Tsochlas said, and what Mr. Karagiorgis said,	25	17 sworn by me and thereupon testified as appears in
		Page 179		Page 181
1		Page 179	1	Page 181 18 the foregoing transcript: that said testimony was
1 2	DEL	-	1 2	18 the foregoing transcript; that said testimony was
2		VECCHIO REPORTING	2	18 the foregoing transcript; that said testimony was19 taken stenographically by me in the presence of
		VECCHIO REPORTING 203) 245-9583	_	the foregoing transcript; that said testimony wastaken stenographically by me in the presence ofcounsel for the respective parties and reduced to
2		VECCHIO REPORTING 203) 245-9583 154	2 3 4	 the foregoing transcript; that said testimony was taken stenographically by me in the presence of counsel for the respective parties and reduced to typewriting under my direction; that the foregoing
2 3 4	(2	VECCHIO REPORTING 203) 245-9583 154 they are going to continue and they're going to	2	the foregoing transcript; that said testimony was taken stenographically by me in the presence of counsel for the respective parties and reduced to typewriting under my direction; that the foregoing is a true and correct transcript of the testimony.
2 3 4 5	1	VECCHIO REPORTING 203) 245-9583 154 they are going to continue and they're going to continue to be good corporate citizens as best	2 3 4 5	the foregoing transcript; that said testimony was taken stenographically by me in the presence of counsel for the respective parties and reduced to typewriting under my direction; that the foregoing is a true and correct transcript of the testimony. I also certify that I am neither of
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			Page 182
1	13	November 30, 2015	
2	14	CCD NO. 00200	
3	15	CSR NO. 00208	
4	16		
	17 18		
6 7	19		
8	20		
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